



**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Sixty-fifth session**

Geneva, 25 November-3 December 2024

Item 3 of the provisional agenda

Listing, classification and packing**Proposal to clarify the requirements on punching holes as
handles on the sides of 4G fibreboard box packagings****Submitted by the expert from China*****I. Introduction**

1. According to 6.1.4.0 of the *Model Regulations*: “Any permeation of the substance contained in the packaging shall not constitute a danger under normal conditions of transport.” Therefore, dangerous goods’ packagings can prevent leakage of internal dangerous goods that may affect the external environment, as well as provide necessary protection against external humid environments that may harm internal dangerous goods.
2. According to 6.1.5.3.6.2 of the *Model Regulations*: “Where a packaging for solids undergoes a drop test and its upper face strikes the target, the test sample passes the test if the entire contents are retained by an inner packaging or inner receptacle (e.g. a plastics bag), even if the closure while retaining its containment function, is no longer sift-proof.” This indicates that the packaging needs to be a complete closure.
3. In daily transport, we can often find 4G fibreboard packagings with holes and ropes on the side of the packaging (as shown in figures I and II) or 4G fibreboard packagings with holes as handles directly (as shown in figure III).

* A/78/6 (Sect. 20), table 20.5.





Figure I



Figure II



Figure III

4. The measures of punching holes and threading ropes to make handles or opening holes as handles on the 4G fibreboard packagings may reduce the protective performance of the packaging itself. In this way, the dangerous goods contained therein can be easily damaged or leak. Thus, we invite the Sub-Committee to clarify whether the above two types of perforation on the packaging are permitted.

II. Proposal 1

5. If the Sub-Committee do not consider such 4G fibreboard packaging as a enclosed package, we recommend to add a description to the UN *Model Regulations* for clarification (new text **bold and underlined**, deleted text ~~striketrough~~):

“6.1.4.12.5 Perforation on the packaging is not permitted.

6.1.4.12.56 Boxes shall be designed so as to provide a good fit to the contents.

6.1.4.12.67 Maximum net mass: 400 kg.”

III. Proposal 2

6. If the Sub-Committee consider the above two types of perforation on the 4G fibreboard packaging to be acceptable, we recommend to clarify that 4G fiberboard boxes with holes need to meet their performance requirements (new text **bold and underlined**, deleted text ~~striketrough~~):

“6.1.4.12.5 Packaging perforated in the design for the ease of transport is permitted, provided that all test requirements for the type of design are met.

6.1.4.12.56 Boxes shall be designed so as to provide a good fit to the contents.

6.1.4.12.67 Maximum net mass: 400 kg.
