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**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 6 (b) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations   
on the Transport of Dangerous Goods:  
Packagings, including the use of recycled plastics material**

Proposal on clarifying the definition of large packaging

Transmitted by the expert from China[[1]](#footnote-2)\*

Introduction

1. In chapter 1.2, section 1.2.1 of the *Model Regulations*, the definition of large packaging is:

“***Large packaging*** means a packaging consisting of an outer packaging which contains articles or inner packagings and which:

(a) is designed for mechanical handling; and

(b) exceeds 400 kg net mass or 450 litres capacity but has a volume of not more than 3 m3;”

2. Some experts understand the meaning of word ‘volume’ as ‘external volume’, but some others understand it as ‘internal volume’, which leads to different requirements during transport.

3. In order to achieve global sustainable development and the "Carbon Peak and Carbon Neutrality" target, the lithium-ion battery industry has developed rapidly in recent years. Accompanied with industrial demand, the lithium battery volume is larger and larger, and there are now some lithium battery products with a volume of 2.7 or 2.8 m3. The overall external volume of these lithium battery together with the packaging can exceed 3 m3. In this case, different understanding of ‘volume’ will lead to disputes on the applicability of LP903.

4. There are many similar expressions in *Model Regulations*. For instance, the definition of *Small freight* in 1.2.1 uses ‘an internal volume of not more than 3 m3’. In chapter 4.1, paragraph 4.1.4.3, the definition of ‘Packaging group III of LP01’ refers to ‘maximum capacity 3 m3’. Using other relevant provisions of the *Model Regulations* as reference, it seems more appropriate to understand "volume" in the definition of large packaging as "internal volume". If the Sub-Committee agrees with this interpretation, we propose to make the following amendments to the definition of large packaging in 1.2.1, together with other references to "volume".

Proposals

Amendments to chapter 1.2

5. Amend the definition of “Large packaging” in 1.2.1 of the *Model Regulations* as follows (new text is shown in **bold and underlined**, deletions in ~~strikethrough~~):

*“Large packaging* means a packaging consisting of an outer packaging which contains articles or inner packagings and which

(a) is designed for mechanical handling; and

(b) exceeds 400 kg net mass or 450 litres capacity but has ~~a~~ **an internal** volume of not more than 3 m3;

6. Amend the definition of “Large salvage packaging” in 1.2.1 of the *Model Regulations* as follows (new text is shown in **bold and underlined**, deletions in strikethrough):

*“Large* *salvage packaging* means a special packaging which

(a) is designed for mechanical handling; and

(b) exceeds 400 kg net mass or 450 litres capacity but has ~~a~~ **an internal** volume of not more than 3 m³;”

Amendments to chapter 2.4

7. Amend the following paragraphs of the Model Regulations as follows (new test is **bold and underlined**, deletions in ~~strikethrough~~):

* 2.4.3.2.3.1 (b):

“(b) A positive result is obtained in a test using a 100 mm sample cube at 140 °C and a negative result is obtained in a test using a 100 mm cube sample at 120 °C and the substance is to be transported in packages with ~~a~~ **an internal** volume of more than 3 m3;”

* 2.4.3.2.3.2 (b):

“(b) A positive result is obtained in a test using a 100 mm sample cube at 140 °C and a negative result is obtained in a test using a 25 mm cube sample at 140 °C, a negative result is obtained in a test using a 100 mm cube sample at 120 °C and the substance is to be transported in packages with~~a~~ **an internal** volume not more than 3 m3;”

* 2.4.3.3.3 (a):

“(a) A positive result is obtained in a test using a 100 mm sample cube at 140 °C and a negative result is obtained in a test using a 25 mm cube sample at 140 °C and the substance is to be transported in packages with ~~a~~ **an internal** volume of more than 3 m3;”

1. \* A/78/6 (Sect. 20), table 20.5. [↑](#footnote-ref-2)