



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

Packing group II metal packagings for organic peroxides and self-reactive substances

Transmitted by the European Chemical Industry Council (Cefic)*

I. Introduction

1. During the sixty-fourth session of the Sub-Committee document ST/SG/AC.10/C.3/2024/1 on packing group II metal packagings for organic peroxides and self-reactive substance was submitted by Cefic.
2. The proposal was discussed in the explosive working group (EWG) and received full support with the text as amended during the joint discussion (see report of the EWG, in informal document INF.67 of the sixty-fourth session, section 14). The proposal was finally discussed in the plenary session, where Cefic experts were not present, and the expert from the United Kingdom gave some further remarks. At that point the representative of Cefic withdrew the proposal.
3. In this case, the proposal is re-submitted to further promote the discussion in plenary with Cefic experts present.

II. Justification

4. Detailed background information was given in document [ST/SG/AC.10/C.3/2024/1](https://unece.org/info/Transport/Dangerous-Goods/events/385416).¹
5. The core message of the proposal is a safety issue for which under high degree of confinement organic peroxides and self-reactive substances may show violent decomposition effects. For this reason, according to packing instruction P520, metal packagings are only allowed for Type E (OP7) and Type F (OP8) organic peroxides and self-reactive substances because these types show less severe decomposition behaviour compared to the other types i.e. Type B – Type D.

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

¹ Document available at : <https://unece.org/info/Transport/Dangerous-Goods/events/385416>



6. Nevertheless, Type E and Type F products may show a more violent decomposition effect in packing group (PG) I compared to PG II metal packagings. For this safety reason, Cefic proposes to reinstate in 4.1.7.1.1 of the “Recommendation on the transport of dangerous goods – *Model Regulations*” the former sentence, as amended based on the discussions in the EWG, and to read as follows:

“To avoid the unnecessary confinement of liquids, metal packagings meeting the criteria of the internal pressure (hydraulic) test for Packing Group I shall not be used.”

III. Proposal

7. Cefic proposes the following amendment to the *Model Regulations*:

Add to 4.1.7.1.1 the following sentence:

“To avoid the unnecessary confinement of liquids, metal packagings meeting the criteria of the internal pressure (hydraulic) test for Packing Group I shall not be used.”
