

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

24 November 2011

Fortieth session

Geneva, 28 November – 7 December 2011

Item 2 (c) of the provisional agenda

Listing, classification and packing: miscellaneous

Amendment to P602

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

1. At the 39th session of the Sub-Committee on the Transport of Dangerous Goods proposal UN/SCETDG/39/INF.59 was adopted, allowing the use of supplementary packaging in a new subsection 4.1.1.5.2:
2. “Use of supplementary packagings within an outer packaging (e.g. an intermediate packaging or a receptacle inside a required inner packaging) additional to what is required by the packing instructions is authorized provided all relevant requirements are met, including 4.1.1.3, and, if appropriate, adequate cushioning is provided to protect against movement within the packaging.”
3. Consequently for substances, assigned to P602, a glass receptacle inside the required inner packaging can be used provided that, in order to assure packaging integrity, this supplementary receptacle is surrounded by cushioning material.
4. However P602 (2) limits the capacity of the inner packaging to 5 litres which means that the available capacity for the dangerous good is reduced by the amount of cushioning material. Therefore only smaller receptacles can be used inside an inner packaging so that the amount of dangerous good present in the inner packaging will be (far) less than the current maximum amount that is allowed to be present inside each inner packaging (i.e. 90 % of the maximum capacity of the inner packaging = 4,5 l).
5. The above mentioned issue has been visualised in the Annex.

Proposal

6. In order to ensure that, when a receptacle is used inside an inner packaging, the maximum amount of dangerous good present inside each inner packaging can be equal to the present maximum allowed amount, it is proposed to amend P602 (2) as follows (new text is underlined):

“Combination packagings consisting of metal **or plastics** inner packagings individually packed with absorbent material sufficient to absorb the contents and inert cushioning material in 1A1, 1A2, 1B1, 1B2, 1N1, 1N2, 1H1, 1H2, 1D, 1G, 4A, 4B, 4N, 4C1, 4C2, 4D, 4F, 4G or 4H2 outer packagings with a maximum gross mass of 75 kg. Inner packagings shall not be filled to more than 90% of their capacity. The closure of each inner packaging shall be physically held in place by any means capable of preventing back-off or loosening of the closure by impact or vibration during transport. Inner packagings shall not exceed 5 litres in capacity.

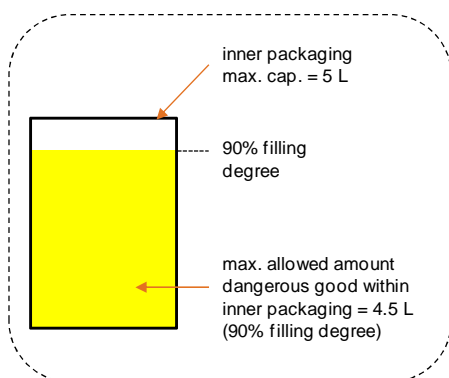
An inner packaging may exceed 5 litres in capacity provided that

- A receptacle inside the required inner packaging is used as a supplementary packaging according to 4.1.1.5.2,
- The capacity of the supplementary receptacle does not exceed 5 litres in capacity, and
- The supplementary receptacle is not filled to more than 90% of its capacity”

7. The addition of “or plastics” was adopted at the 39th session of the Sub-Committee on the Transport of Dangerous Goods based upon proposal UN/SCETDG/39/INF.59

ANNEX:**visual presentation of the issue**

Requirements of P602 (2) **without** a receptacle (supplementary packaging) inside an inner packaging



Requirements of P602 (2) **with** a receptacle (supplementary packaging) inside an inner packaging

