Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Reference to P801 in 4.1.4.1, packing instruction P003, special packing provision PP16

Note by the secretariat

During the consideration of the texts adopted by the Joint Meeting at its autumn 2019 session, it was noted that the amendment proposed to replace "P801a" by "P801 (2)" in packing instruction P003, PP16, Note 2 could be inconsistent with packing instruction P801 which seemed to apply, as a whole, to used batteries of UN No. 2800.

Packing instruction P801a of RID/ADR 2019 will be covered by P801 (2) in RID/ADR 2021 and only this part of the packing instruction will probably be applied for used batteries of UN No. 2800 since P801 (1) contains more stringent restrictions.

However, P801 as drafted for RID/ADR 2021 allows the choice of either (1) or (2) and it seems not correct to restrict the cross-reference in P003, PP16 to P801 (2).

Therefore, it is proposed to refer only to P801 in P003, PP16 as follows:

Proposal:

In informal document INF.7, replace the amendment to 4.1.4.1, P003, PP16 by the following:

4.1.4.1, P003 For special packing provision PP16, replace "P801a" by "P801".