

UN/SCETDG/16/INF7

**Sub Committee of Experts on the
Transport of Dangerous Goods
Sixteenth session
(Geneva, 5-16 July 1999,
agenda item 5 (d))**

MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS

Unpackaged Articles

Transmitted by the Expert from the United Kingdom

BACKGROUND

1. Paragraph 4.1.3.15 of the Model Regulations permits large and robust explosive articles of Class 1, normally intended for military use, to be carried unpackaged provided requirements on initiation are met. The UK suggests that a similar provision should be included for unpackaged goods and articles in other classes without compromising safety.
2. The Expert from the UK has recently been shown a range of specialist flexible fuel containment systems that are used mainly by military forces in field operations. These fuel containment systems are moved empty and clean to locations where they are filled with fuel for storage. At the end of an exercise or operation they are emptied, folded and returned to base. It is impossible to clean and purge these containment systems in the field and therefore they must be returned empty and uncleaned. Some of the smaller versions of fuel containment systems can be transported as empty articles in suitably certified packagings and large packagings. However there are some very large flexible containment systems that are moved on specially designed pallets which are not packages and which weigh in excess of 5 tonnes. Increasingly this equipment is being moved by civilian transport operators not under the direct control of the armed forces.
3. The UK believes that there are probably other articles, which are not in Class 3, which also cannot be packaged. It would therefore be appropriate to address this as a generic rather than a class specific issue. It is anticipated that discussion of this issue will identify other issues related to unpackaged articles which might therefore be usefully assigned a separate section in Part 4 of the Model Regulations.

PROPOSAL

4. The Expert from the United Kingdom proposes that the issue of unpackaged articles should be addressed in the Model Regulations and suggests adding a new paragraph with the following wording;

- 4.1.9. 'Unpackaged Articles'

- 4.1.9.1 Where large and robust articles, such as collapsible flexible fuel containment systems, have to be transported empty, uncleaned and unpackaged, the competent authority may approve such transport.

5. Consequential amendment:

- Renumber 4.1.3.15 as 4.1.9.2
