

## 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  
Twenty-fourth session  
Geneva, 3-10 December 2003  
Item 4 (c) of the provisional agenda

### PACKAGINGS (INCLUDING IBCs AND LARGE PACKAGINGS)

#### Miscellaneous proposals

Comments on ST/SG/AC.10/C.3/2003/56 (Australia)

Transmitted by the expert from the United Kingdom

#### **Introduction**

1. The expert of the United Kingdom welcomes the efforts of the expert of Australia in document ST/SG/AC.10/C.3/2003/56 to address problems associated with the loading and stacking of IBCs in transport units by proposing text for Part 7 of the Model Regulations.
2. However the expert of the United Kingdom believes that the Sub-Committee should take this opportunity to apply a more generic approach to such issues rather than restricting the proposal to IBCs.
3. We note that the expert of Australia has taken account of suggestions made during the last session of the Sub-Committee to make reference to the joint IMO/ILO/ UN ECE Guidelines for Packing CTUs. The expert of the United Kingdom has reviewed that document, together with the Australian proposal, and considered further that there is already text in Chapter 7.1 of the Model Regulations addressing at least some of the general issues associated with loading and stacking of dangerous goods packagings. That review leads the United Kingdom to believe that amplifying the existing text would be useful.
4. It may be difficult to include text without seriously disrupting the existing layout and numbering of Chapter 7.1. The proposed layout below may not necessarily be ideal but the expert of the United Kingdom would welcome comments from the Sub-Committee in order to make a formal proposal at the next session.

#### **Proposal**

In the following proposal existing UN text is in normal case and new text is shown in italics.

Replace existing 7.1.1 with the following:

**7.1.1 Application, general provisions and loading requirements**

7.1.1.1 This Chapter contains provisions applicable to dangerous goods transport operations by all modes of transport.

7.1.1.2 Dangerous goods shall not be accepted for transport, or transported, unless those goods have been properly classified, packaged, marked, labelled, placarded, described and certified on a transport document, and are otherwise in a condition for transport as required by these Regulations.

7.1.1.3 *Packages containing dangerous goods shall only be packed in transport units that are strong enough to withstand the shocks and loadings normally encountered during transport, including trans-shipment between transport units, having regard to the conditions to be expected during the anticipated journey. The transport unit shall be constructed in such a way as to prevent the loss of contents during normal conditions of transport, or by changes in temperature, humidity or pressure.*

7.1.1.4 *The interior and exterior of transport units shall be inspected prior to loading to ensure that there is no damage that could affect its integrity or that of the packages to be loaded.*

7.1.1.5 *Transport units shall be loaded in such a way as to ensure incompatible goods are properly segregated (see 7.1.2) and that specific loading instructions such as orientation arrows, not to be double stacked, keep dry or temperature control requirements are met. Liquid dangerous goods shall be loaded below dry dangerous goods.*

7.1.1.6 Packages containing dangerous goods shall be secured by suitable means *capable of restraining the load (such as fastening straps, sliding slatboards, adjustable brackets etc)* in the transport unit in a manner that will prevent any movement during the journey which would change the orientation of the packages or cause them to be damaged. *Where restraints such as banding or straps are used, these shall not be over-tightened to cause damage or deformation of the packaging. Packages shall not be stacked unless designed for that purpose. Where necessary, stacked packages shall be prevented from damaging the package below by the use of load-bearing devices.*

7.1.1.7 During loading and unloading, packages containing dangerous goods shall be protected from being damaged. Particular attention shall be paid to the handling of packages during their preparation for transport, the type of transport unit on which they are to be carried and to the method of loading or unloading, so that accidental damage is not caused through dragging or mishandling the packages. *The loader shall ensure that packages are fit for transport and that no residue of dangerous goods adheres to the outside of the package, IBC or large packaging. Packages that appear to be damaged shall not be accepted for transport.*

7.1.1.8 During transport *[packages]* IBCs, large packagings and unpackaged articles shall be securely fixed or packed into the transport unit so as to prevent undesired lateral or longitudinal movement or impact *likely to cause damage* and so as to provide adequate external support.

**NOTE 1:** Additional operational requirements for the transport of packagings, IBCs and large packagings are provided in the special packing provisions for packagings, IBCs and large packagings (see Chapter 4.1).

**NOTE 2:** *Additional guidance on the packing of transport units can be found in the IMO/ILO/UNECE Guidelines for Packing Cargo Transport Units (CTUs) contained in the supplement to the International Maritime Dangerous Goods Code. National Codes of Practice (such as the UK DfT Code of Practice on Safety of Loads on Vehicles) may also be available.*

---