

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

Wooden barrels

Comments on ST/SG/AC.10/C.3/2003/39

Note by the secretariat

1. Reference is made to the proposal by the United Kingdom in ST/SG/AC.10/C.3/2003/39, the comments by Norway in INF.15 and the explanations given on pages 3 and 4 of ST/SG/AC.10/29/Add.1/Corr.1 concerning decisions taken by the Committee concerning wooden barrels and their interpretation.
2. The secretariat recalls that the decision taken by the Committee was to remove the cooerage for wooden barrels on the grounds that testing laboratories had no experience about such tests. However, the other provisions of Chapter 6.1 remain applicable, as appropriate.
3. The expert from the United Kingdom proposes that wooden barrels should be authorized for UN 3065 alcoholic beverages only, and not for UN 1170.
4. The expert from the United Kingdom also proposes that all references to wooden barrels be removed from Chapter 6.1, which seems to imply that such wooden barrels would not be subject to any conditions of Chapter 6.1. If this is the intent, the secretariat believes that this should be made clear also in Chapter 4.1 in order to avoid any misunderstanding. In accordance with 4.1.1.3, it would be necessary to specify somewhere that such wooden barrels are not subject to Chapter 6.1. The best place might be special packing provision PP2 itself. The following words could be added: "Such wooden barrels are not subject to the provisions of Chapter 6.1".
The secretariat notes that the effect of such a change would be not only to exempt wooden barrels from the testing provisions, but also to remove the present upper capacity limit of 250 litres.
5. The expert from the United Kingdom also proposes to insert the sentence "meeting the general requirements of 4.1.1, as appropriate," to special provision 247. As mentioned in INF.15 from Norway, special provision 247 had been specifically designed for a certain type of alcoholic beverage where, for traditional reasons, carriage by sea is part of the manufacturing process and where the packaging is a wooden cask up to 500 l rather than a wooden barrel. The secretariat is of the view that special provision 247 does not apply now to wooden barrels apart from the casks mentioned therein, in particular since it is not likely that wooden barrels are carried exclusively in freight containers and since, although using a wooden barrel as a containment system is probably part of the manufacturing process, transporting such wooden barrels is not usually part of the manufacturing

process. Therefore the proposed amendment to special provision 247 should be clarified as regards its relation with all other amendments proposed for wooden barrels.

6. In order to minimize the number of consequential amendments due to renumbering, the secretariat suggests that, if the Sub-Committee decided to delete 6.1.4.6, the existing text should be replaced by "6.1.4.6 (deleted)".
