
COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

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PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)

Packing Instructions P601 and P602

Transmitted by the expert of Germany

Background

Option (1) of Packing Instructions P601 and P602 provide for the use of combination packagings consisting of glass bottles enclosed in metal receptacles together with absorbent and cushioning material packaged in various outer packagings. This packaging technique is state of the art for some aggressive substances and shall not be changed.

However, the wording has provoked some obstacles for the free international shipment of such packages. These obstacles could easily be removed by an improved wording without touching the intentions of this packing provisions.

In particular, the position of the term “individually packed in 1A2, ... ” prohibits the application of Combination packagings filled with more than one metal receptacle, containing one glass bottle each. The intention was to have the glass bottles individually packaged in the metal receptacle together with the shock and liquid absorbent material.

This proposed amendment could also align the diverging wording of P 601(1) and P 602(1).

Proposal

It's proposed to redraft the text of P601(1) and P602(1) as follows:

P 601(1) Combination packagings with a maximum gross mass of 15 kg consisting of one or more glass inner packagings with a maximum quantity of 1 litre each and filled to not more than 90% of their capacity, individually packed in metal receptacles together with inert absorbent and cushioning material packed in 1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4D, 4F, 4G or 4H2 outer packagings. The metal packagings together with the absorbing and cushioning material shall be capable of absorbent the entire liquid contents, to prevent hard shocks to the glass inner packaging and the loosening of the closures by impact or vibration during transport.

P 602 (1) Combination packagings with a maximum gross mass of 50 kg consisting of one or more glass inner packagings with a maximum quantity of 1 litre each and filled to not more than 90% of their capacity, individually packed in metal receptacles together with inert absorbent and cushioning material packed in 1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4D, 4F, 4G or 4H2 outer packagings. The metal packagings together with the absorbing and cushioning material shall be capable of absorbent the entire liquid contents, to prevent hard shocks to the glass inner packaging and the loosening of the closures by impact or vibration during transport.

Justification

The existing wording of this provision caused misunderstanding and different interpretation provoking obstacles for international shipments. The rewording in line with the initial intentions.
