

## 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

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### LISTING, CLASSIFICATION AND PACKING

#### Packing Instruction P099

Transmitted by the expert from Australia

#### **SCOPE**

This paper recommends clarification of the requirements of packing instruction P099 to facilitate its consistent application.

#### **Introduction**

1. A number of shipments of Nitromethane (UN1261) have been received in Australia and transhipped to other countries after a period of storage. Whilst the consignments were being prepared for their subsequent shipment the consignor approached the Australian competent authority for sea transport seeking clarification of the requirements in respect of packing instruction P099.
2. Subsequent investigations revealed that no documentation, per P099, had been provided for the original shipment and the Australian consignor was unable to obtain confirmation that the packages had been approved by the competent authority in the country of origin as required. As a result the Australian competent authority conducted its own investigations before issuing approval for the shipment of these goods.

#### **Issues**

3. These Nitromethane (UN1261) shipments are used as examples but the situation is not isolated to these incidents. This evidence suggests that some consignors consider any competent authority approval for a package intended for the carriage of dangerous goods to comply with the requirements of packing instruction P099.
4. This approach is inconsistent with the wording of packing instruction P099 and the reference to section 4.1.3.7. Therefore it is possible that consignors are misconstruing the wording of 4.1.3.7, possibly as a result of the reference to 'alternative packaging' and that they are not aware of the requirement for a specific approval.

**Proposal**

5. It is recommended that any doubt relating to the requirements of packing instruction P099 are removed by harmonizing the text with the intent of section 4.1.3.7:

<b>P099</b>	<b>PACKING INSTRUCTION</b>	<b>P099</b>
<p>Only packagings which are approved by the competent authority may be used (see <b>4.1.3.7</b>).</p> <p><u><i>Either: a copy of the competent authority approval shall accompany each consignment; or the transport document shall include an indication that the packaging was approved by the competent authority.</i></u></p>		

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