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**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

Thirty-fifth session
Geneva, 22–26 June 2009
Item 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Packing Instruction P010 – Provision for the use of pressure receptacles

Transmitted by the European Chemical Industry Council (CEPIC)¹

Introduction

1. At the twenty-ninth session of the Sub-Committee of Experts on the Transport of Dangerous Goods, ICCA submitted document ST/SG/AC.10/C.3/2006/11, which proposed several amendments to the provisions for chlorosilanes. This proposal, supplemented with additional information in informal document INF.18, was adopted at the thirtieth session of the Sub-Committee of Experts on the Transport of Dangerous Goods session. This resulted in the assignment of a new specific packing instruction P010 instead of P001 to chlorosilanes of the classes 3, 6.1 and 8. Unfortunately the proposal from industry omitted to take over in P010 the provision of P001 that pressure receptacles may be used (provided they meet the general provisions of subsection 4.1.3.6.).

¹ In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118(b) and ST/SG/AC.10/36, para. 14).

2. Pressure receptacles are used in particular for shipments of high purity chlorosilanes for applications in the electronics industry, where often there is no alternative adequate packaging type because of special filling and emptying processes in clean-room manufacturing.

3. According to 4.1.3.6.1 these chlorosilanes can still be carried in pressure receptacles as all requirements of this provision are met. However, because the use of pressure receptacles is not authorized in the applicable packing instruction (i.e. P010), 4.1.3.7 requires a competent authority approval, of which a copy should accompany each consignment.

4. P010 has meanwhile been transposed into the modal regulations and e.g. for RID/ADR/ADN is becoming mandatory on 1 July 2009 after the expiration of the transitional period of 6 months. Therefore CEFIC introduced informal document INF.15 at the Joint RID/ADR meeting in March 2009 in order to get the opinion of the Joint Meeting on the use of pressure receptacles for chlorosilanes of classes 3, 6.1 and 8, and in order to get a multilateral agreement initiated in RID/ADR. The Joint Meeting expressed general support for CEFIC to make the current proposal at the Sub-Committee of Experts on the Transport of Dangerous Goods and national delegations expressed commitment to sign a multilateral agreement, which the Belgian competent authority accepted to initiate. This agreement will cover the period between 1st July 2009 (the end of the transitional period for RID/ADR/ADN 2009) and 31 December 2012 (the date by when the change will have been transposed from the 17th revised UN Model Regulations into RID/ADR/ADN 2013).

Proposal

5. CEFIC therefore proposes to introduce the following provision in P010, identical to the existing provision in P001:

“Pressure receptacles, provided that the general provisions of 4.1.3.6 are met”.

Justification

6. Pressure receptacles have been used for the carriage of chlorosilanes of classes 3, 6.1 and 8 since many years (as allowed by P001) without problems and they are without any doubt the safest type of packaging for these very dangerous substances.

7. In view of the discussion at the Joint Meeting, it is anticipated that many European competent authorities will sign the multilateral agreement, referred to in paragraph 4 above. Therefore this proposal by CEFIC can be considered to be in line with the Note below 4.1.3.7 mentioning that “action should be taken to amend the Model Regulations to include the provisions covered by the approval as appropriate”. A copy of the multilateral agreement, when issued, will be made available to the Sub-Committee as an INF paper, supplementing this proposal.

Considerations for modal regulations

8. RID/ADR/ADN: see paragraph 4
 9. IMDG Code: Subsection 4.1.3.9 of the IMDG Code, which does exist neither in the UN Model Regulations nor in the ADR/RID, provides sufficient relief for this mode to cover the gap till the anticipated transposition into the 36th amendment.
 10. ICAO-TI: there is no such problem till 1 January 2011, when the 2011-2012 edition of the ICAO-TI (and the 52nd edition of the IATA-DGR) will become effective. Indeed, in the 2009-2010 edition of the ICAO-TI (and the 50th edition of the IATA-DGR) pressure receptacles are still permitted for these chlorosilanes. In order to cover the gap till 1 January 2013 CEFIC has submitted a proposal to the ICAO-DGP Working Group of the whole meeting in May 2009.
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