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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-sixth session
Geneva, 30 November – 9 December 2009
Item 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Maximum net quantity

Transmitted by the International Council of the Chemical Associations (ICCA)¹

Introduction

1. At its thirty-fourth session the Sub-Committee adopted the proposal of ICCA in ST/SG/AC.10/C.3/2008/64 to amend P601 (first indent) and P602 (first indent) by replacing “maximum capacity of 1 litre” by “maximum net quantity of 1 litre” in order to allow inner packagings to be actually filled with 1 litre of product. During the discussion however several delegates pointed out that the problem raised by ICCA is not confined to packing instructions P601 and P602 and suggested revisiting the issue in a more global context. ICCA has now undertaken such a review and has indeed identified a number of amendments that could be made.

2. ICCA is of the opinion that a similar amendment i.e. replacing “maximum capacity” by “maximum net quantity” should only apply to receptacles with a maximum inner volume of less than 60 litres and only to inner components of combination packagings. This limitation leads only to slight increases in the respective filling volume and leaves the provisions for the outer packaging unchanged. ICCA believes that the proposed amendments will not cause an increased safety risk during transport.

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).

3. ICCA is further of the opinion that there is the need to introduce in 1.2.1 a definition of “Maximum net quantity” for inner packagings, to which reference can be made in the general provisions concerning packing instructions of 4.1.3.3. Currently “maximum net mass” and “maximum capacity” are mainly used to limit the size of single and of outer packagings, whereas inner packagings are only regulated concerning their individual maximum capacity and their contribution to the net mass of the outer packaging. The proposed definition helps limiting the net quantity of substance contained in each inner packaging in a clear manner, whilst remaining compatible with the existing provisions in UN Model Regulations and with the upcoming reformatted provisions of ICAO Technical Instructions for the Safe Transport of Dangerous Goods (ICAI TI).

4. In order to define the provisions for inner packagings more clearly, there is need to amend the subheadings of a number of packing instructions:

- (a) Adding “maximum net quantity” after “Inner packagings” in P001, P002, P010, P402, P403, P410, P502, P503, LP01 and LP02. For P402 the existing sentence “Maximum net mass”, which now covers both inner and outer packagings, is moved to refer to outer packaging only.
- (b) Replacing “maximum capacity” by “maximum net quantity” in P401 and P501

The respective proposed amendments can be found below in paragraphs 9 to 12.

5. For the same reason as explained in paragraph 1, it is proposed replacing “maximum capacity” by “maximum net quantity” in the relevant sections of the packing instructions P300, P400, P504 and P802. This change is similar to what was adopted for P601 and P602 in the last biennium. For reasons of editorial consistency it is also proposed using “containing” instead of “with” in packing instructions P601 and P602 and therefore (slightly) amending the text in indent 1, which was adopted in the thirty-fourth session.

The respective proposed amendments can be found in paragraphs 13 to 18.

6. During this review an anomaly was noticed in packing instructions P502 and P503, where the subheading “Outer packagings” is missing in the second column of the box for combination packagings. In packing instruction P503 a further anomaly was noticed, where the maximum capacity of drums as single packagings is expressed in kg whereas the subheading is “Maximum capacity”, which, according to the definition in 1.2.1, should be expressed in litres. As P503 applies to solids only ICCA is of the opinion that indeed “kg” should be used, in analogy with P002, which also applies to solids only. It is therefore proposed to either remove the subheading (there is already this subheading in the same column next to “Combination packagings”) or to replace it by “maximum net mass”. The respective proposed amendments can be found in paragraph 19 and 20.

Proposals

7. Insert a new definition in 1.2.1

“Maximum net quantity means the maximum mass or volume of substances contained in an inner packaging and is expressed in kg or litres;”.

8. Amend 4.1.3.3 to read as follows:

“4.1.3.3 Each packing instruction shows, where applicable, the acceptable single and combination packagings. For combination packagings, the acceptable outer packagings, inner

packagings and when applicable the maximum quantity permitted in each inner or outer packaging, are shown. Maximum net mass, maximum net quantity and maximum capacity are as defined in 1.2.1.”.

9. Amend the subheading of Packing Instructions P001, P002, P010, P403, P410, P502, P503, LP01 and LP02 to read:

**“Inner packagings
maximum net quantity”.**

10. Amend the subheading of Packing Instruction P401 to read:

Maximum capacity/Net mass (see 4.1.3.3)	
Inner packaging <u>maximum net quantity</u>	Outer packaging <u>maximum net mass</u>

11. Amend the subheading of Packing Instruction P402 to read:

Maximum net mass	
Inner packaging <u>maximum net quantity</u>	Outer packaging <u>maximum net mass</u>

12. Amend the subheading of Packing Instruction P501 to read:

“Inner packaging - ~~maximum capacity~~ net quantity”.

13. Amend Packing Instruction P300 (main box) to read:

“Combination packagings consisting of inner metal cans ~~of not more than 1 litre capacity containing a maximum net quantity of 1 litre~~ each and outer wooden boxes (4C1, 4C2, 4D or 4F) containing not more than 5 litres of solution.”.

14. Amend Packing Instruction P400, paragraphs (2) and (3) to read:

- “(2) Boxes (4A, 4B, 4C1, 4C2, 4D, 4F or 4G), drums (1A2, 1B2, 1N2, 1D or 1G) or jerricans (3A2 or 3B2) enclosing hermetically sealed metal cans with inner packagings of glass or metal, ~~with a capacity of not more than~~ containing a maximum net quantity of 1 litre each, having threaded ...
- (3) Steel, aluminium or metal drums (1A2, 1B2 or 1N2), jerricans (3A2 or 3B2) or boxes (4A or 4B) with a maximum net mass of 150 kg each with hermetically sealed inner metal cans ~~with not more than 4 litre capacity~~ containing a maximum net quantity of 4 litres each, with threaded ... ” (remainder unchanged).

15. Amend Packing Instruction P504, paragraphs (1) to (4) under “Combination packaging” to read:

“(1) Outer packagings: (1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4C2, 4D, 4F, 4G, 4H2)
Inner packagings: Glass receptacles ~~with a maximum capacity~~ containing a maximum net quantity of 5 litres

- (2) Outer packagings: (1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4C2, 4D, 4F, 4G, 4H2)
Inner packagings: Plastic receptacles ~~with a maximum capacity~~ containing a maximum net quantity of 30 litres
- (3) Outer packagings: 1G, 4F or 4G
Inner packagings: Metal ~~with a maximum capacity~~ containing a maximum net quantity of 40 litres
- (4) Outer packagings: (1A2, 1B2, 1N2, 1H2, 1D, 4A, 4B, 4C1, 4C2, 4D, 4H2)
Inner packagings: Metal receptacles ~~with a maximum capacity~~ containing a maximum net quantity of 40 litres”.

16. Amend Packing Instruction P601, paragraphs (1) and (2) to read:

- “(1) Combination packagings with a maximum gross mass of 15 kg, consisting of – one or more glass inner packaging(s) ~~with~~ containing a maximum net quantity of 1 litre each and filled to not more than 90% of their capacity; ...” (remainder unchanged);
- (2) Combination packagings consisting of metal inner packagings ~~not exceeding 5 litres in capacity~~ containing a maximum net quantity of 5 litres individually packed with absorbent material ...” (remainder unchanged).

17. Amend Packing Instruction P602, paragraphs (1) and (2) to read:

- (1) Combination packagings with a maximum gross mass of 15 kg, consisting of – one or more glass inner packaging(s) ~~with~~ containing a maximum net quantity of 1 litre each and filled to not more than 90% of their capacity; ... (remainder unchanged)
- (2) Combination packagings ... (unchanged) ... during transport. Inner packagings shall ~~not exceed 5 litres in capacity~~ contain a maximum net quantity of 5 litres each.

18. Amend Packing Instruction P802, paragraphs (1) and (2) to read:

- (1) Combination packagings
Outer packagings: 1A2, 1B2, 1N2, 1H2, 1D, 4A, 4B, 4C1, 4C2, 4D, 4F, or 4H2;
maximum net mass: 75 kg.
Inner packagings: glass or plastics; ~~maximum capacity~~ net quantity: 10 litres.
- (2) Combination packagings
Outer packagings: 1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4C2, 4D, 4F, 4G or 4H2;
maximum net mass: 125 kg.
Inner packagings: metal; ~~maximum capacity~~ net quantity: 40 litres

19. Introduce an additional subheading in the second column of Packing Instructions P502, P503 to read:

“Outer packagings”
Drums ...

20. Delete or amend the subheading of the last column (next to **Single packagings**) of Packing Instruction P503 to read:

“Maximum ~~capacity~~ net mass”.
