



**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****Fortieth session**

Geneva, 28 November – 7 December 2011

Item 4 (a) of the provisional agenda

**Miscellaneous proposals of amendments to the Model Regulations
on the Transport of Dangerous Goods: packagings****Large salvage packagings****Transmitted by the experts from Belgium and Germany¹****Background**

1. At the thirty-ninth session of the Sub-Committee in June 2011, the expert from Germany submitted ST/SG/AC.10/C.3/2011/13, in which the issue was raised of salvage packagings exceeding the mass limit of 400 kilograms when taking into account the tare mass of the defective packagings, padding and absorption material to be placed inside the salvage packaging. The proposal was to add a note to 6.1.5.1.11 to clarify the situation.
2. In reaction the expert from Belgium submitted informal document INF.53 containing an alternative proposal to include a regime for large salvage packagings in the Model Regulations based on the definition of a large packaging and the test regime for currently defined salvage packagings. This proposal would address the concerns raised by Germany and widen the application field of salvage packagings.
3. Report ST/SG/AC.10/C.3/78 para 63, mentions that the above mentioned alternative is preferable for the Sub-Committee and that a new proposal would be submitted.

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

Proposal

4. Insert a new definition in § 1.2.1:
- “Large salvage packaging” means a special packaging which
- (a) is designed for mechanical handling; and
 - (b) exceeds 400 kg net mass or 450 litres capacity but has a volume of not more than 3m³;
- into which damaged, defective or leaking dangerous goods packages, or dangerous goods that have spilled or leaked are placed for purposes of carriage for recovery or disposal.”

Justification

5. It would have been easier to be able to say, in analogy to salvage packagings, that large salvage packagings are special large packagings. However, in the definition of large packagings it is specified that the packaging must consist of an outer packaging containing articles or inner packagings. This would prevent spilled or leaked dangerous goods from being placed directly in the large salvage packaging, hence the repetition of the dimensional requirements for large packagings in the proposed definition.
6. Modify 6.6.2.2 to read as follows (changes underlines):
- 6.6.2.2 The letters “T” or “W” may follow the large packaging code. The letter “T” signifies a large salvage packaging conforming to the requirements of 6.6.5.1.9. The letter “W” signifies that the large packaging, although of the same type indicated by the code, is manufactured to a specification different from those in 6.6.4 and is considered equivalent in accordance with the requirements in 6.6.1.3.

Justification

7. From the packaging code starting with 50 or 51, it is clear that the packaging concerned is a large packaging. The letter “T” is currently used for salvage packagings under 6.1.5.1.11 and has a long standing and generally accepted meaning of specifying “salvage”. Hence it is proposed to retain the “T” marking also in the marking for large salvage packagings.

8. Insert a new example in 6.6.3.2 (optional):

6.6.3.2 Examples of the marking – second example:

	50AT/Y/05/01/B/PQRS 2500/1000	<i>For a large steel salvage packaging suitable for stacking; stacking load: 2500 kg; maximum gross mass: 1000 kg.</i>
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Justification

9. Repeating a known example with only the variation of the “salvage” aspect highlights this specification and makes it clearer for the users.
10. Insert a new 6.6.5.1.9:
- “6.6.5.1.9 Large salvage packagings

11. Large salvage packagings (see 1.2.1) shall be tested and marked in accordance with the provisions applicable to packing group II large packagings intended for the transport of solids or inner packagings, except as follows:

- (a) The test substance used in performing the tests shall be water, and the large packagings shall be filled to not less than 98% of their maximum capacity. It is permissible to use additives, such as bags of lead shot, to achieve the requisite total package mass so long as they are placed so that the test results are not affected. Alternatively, in performing the drop test, the drop height may be varied in accordance with 6.6.5.3.4.4.2 (b);
- (b) Large packagings shall, in addition, have been successfully subjected to the leakproofness test at 30 kPa, with the results of this test reflected in the test report required by 6.6.5.4; and
- (c) Large packagings shall be marked with the letter “T” as described in 6.6.2.2.”

Justification

12. The test performance of large salvage packagings is, in analogy with salvage packagings in 6.1.5.1.11, modelled on the test requirements for packing group II performance level large packagings.
