

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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Item 3 (c) of the provisional agenda

Listing, classification and packing: miscellaneous

Packing Instruction P 602/ ST/SG/AC.10/C.3/2011/19

Transmitted by the Dangerous Goods Advisory Council

1. Based on discussion of ST/SG/AC.10/C.3/2011/19, proposed text for the end of P602(2) is withdrawn and alternatively a general provision applicable to all packing instructions is proposed.
2. During the discussion it was generally agreed that supplementary packaging could be acceptable. There is precedence in that for limited quantities in 3.4.2 it states, “Intermediate packagings may be used.” Rather than amending P602(2) to recognize the use of supplementary packagings, it is proposed that a general requirement be adopted. The proposed text is as follows:

“4.1.1.17 Use of supplementary packagings within an outer packaging (e.g. an intermediate packaging or a receptacle inside a required inner packaging) additional to what is required by the packing instructions is authorized provided all relevant requirements are met, including 4.1.1.3, and, if appropriate, adequate cushioning is provided to protect against movement within the packaging.”
3. DGAC would like to maintain its proposal for use of plastic inner packagings in P602(2). Use of plastic packagings is preferable, particularly in the case of substances that are corrosive to metals. Packagings incorporating plastic inner packagings would be subject to the same performance requirements as packagings including metal inner packagings. The proposal would be as follows:

“(2) Combination packagings consisting of metal **or plastic** inner packagings individually packed with absorbent material sufficient to absorb the contents and inert cushioning material in 1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4C2, 4D, 4F, 4G or 4H2 outer packagings with a maximum gross mass of 75 kg. Inner packagings shall not be filled to more than 90% of their capacity. The closure of each inner packaging shall be physically held in place by any means capable of preventing back-off or loosening of the closure by impact or vibration during transport. Inner packagings shall not exceed 5 litres in capacity.”
3. A similar amendment to P 601 (2) for purposes of consistency is proposed.