

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

20 November 2013

Forty-fourth session

Geneva, 25 November – 4 December 2013

Item 5 (g) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: packagings

Comments on ST/SG/AC.10/C.3/2013/47: Excepted quantity provisions regarding the use of absorbent and cushioning material

Transmitted by the expert from the United States of America

Introduction

1. The working paper presented by the expert from the ICCA proposes amendments to 3.5.2 to provide options for the placement of absorbent material inside of a package containing excepted quantities of dangerous goods. We support providing flexibility in the location of the absorbent material in packages containing excepted quantities of liquid dangerous goods for the following reasons:

- (a) The provisions in 3.5.2 limit quantity and the type of materials authorized as excepted quantities;
- (b) The provisions of 3.5.3 require the complete package as prepared for transport to successfully pass drop tests in multiple orientations without leakage of any inner packaging and a stack test.

2. We believe that the proposals in ST/SG/AC.10/C.3/2013/47 can be simplified by clearly stating within 3.5.2 (b) that absorbent/cushioning material may be placed in the intermediate or the outer packaging.

Proposal

“3.5.2 Packagings

- (b) Each inner packaging shall be securely packed in an intermediate packaging with cushioning material in such a way that, under normal conditions of transport, it cannot break, be punctured or leak its contents. The intermediate packaging shall completely contain the contents in case of breakage or leakage, regardless of the package orientation. For liquid dangerous goods, the intermediate or outer packaging shall contain sufficient absorbent material to absorb the entire contents of the inner packaging. In such cases, the absorbent material may be the cushioning material. Dangerous goods shall not react dangerously with cushioning, absorbent material and packaging material or reduce the integrity or function of the materials;”