

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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New proposals for amendments to the Model Regulations on the Transport of Dangerous Goods

Amendments to P 909

Submitted by the expert from Germany

Introduction

1. Paragraph 3 of P909 permits unpackaged transport of large equipment. In the application of this packing instruction, the question arises as to what is meant by large equipment.
2. Also within the framework of the discussion on the conditions of transport for prototypes and small production runs in accordance with special provision 310, the Sub-Committee had to deal with the differentiation between large and small equipment. The proposal in document ST/SG/AC.10/C.3/2014/12 provided for the transport of large equipment containing prototype batteries and/or batteries of small production runs under the conditions specified by the competent authority. After discussing this issue, it was decided to only use the word “equipment” and not the words “large equipment”, see ST/SG/AC.10/C.3/2014/73.
3. As it is not possible to clearly differentiate large equipment from other equipment and, in particular within the framework of the transport of electrical equipment for disposal or for recycling, there is a need for unpackaged transport, the word “large” should be deleted in P909(3). However, it must always be ensured that the batteries are afforded equivalent protection by the equipment in which they are contained.

Proposal

4. Amend P 903 (3) as follows:
“(3) For cells or batteries contained in equipment, strong outer packagings constructed of suitable material, and of adequate strength and design in relation to the packaging capacity and its intended use, may be used. Packagings need not meet the requirements of 4.1.1.3. ~~Large equipment~~ Equipment may be offered for transport unpackaged or on pallets when the cells or batteries are afforded equivalent protection by the equipment in which they are contained.”