



**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****Forty-ninth session**

Geneva, 27 June – 6 July 2016

Item 3 of the provisional agenda

Listing, classification and packing**New E code for dangerous goods in excepted quantities****Transmitted by the Dangerous Goods Advisory Council (DGAC)¹****Introduction**

1. DGAC proposes an amendment to the provisions of Chapter 3.5 for dangerous goods in excepted quantities by creating a new E code [E6] which would authorize inner packagings not to exceed 1 gram for solids or 1 ml for liquids in outer packagings not to exceed 1000 grams or ml.

Background

2. Products containing alcohols (e.g., UN1170, UN1219, and UN1987, each of which is currently assigned E2) are commonly used in medical and sterilization products, and are distributed globally by all modes. Pictures of such inner and outer packaging, along with examples of their application, are provided in the annex.

3. Beyond transport, packaging methods and quantities are often strictly controlled by governmental regulators. Manufacturers are frequently required to obtain an approval of the packaging prior to use and permission to make subsequent changes to the packaging can be difficult to obtain. Consequently, manufacturers of these products seek to design packagings that provide maximum flexibility for the needs of various users and

¹ In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

simultaneously satisfy the transport regulations as well as authorities in other government sectors.

Justification

4. For UN numbers to which the code E2 is assigned, the proposal would reduce the maximum permitted quantity per inner packaging by a factor of 30 and increase the maximum permitted quantity per outer packaging by a factor of 2. Inner packaging limitations would conform to existing codes E1 – E5 and the provisions of 3.5.1.4(a). These quantities are consistent with what is referred to as “de minimis” quantities in the guiding principles (i.e., 1 ml or gram). However, the outer packaging limitation would conform to existing code E1 so that these packages would be subject to the provisions for excepted quantities.

5. Safety would not be compromised. Dangerous goods would be packed in very small inner packagings and the completed packages would conform to existing excepted quantities provisions such as those for hazard communication marking and packaging capability, design and testing.

6. Manufacturers would be able to design a packaging to meet the requirements of the Model Regulations, obtain the necessary type approval from other relevant authorities, and yet be flexible enough to meet the varying needs of their customers without using the limited quantity provisions which would force them into unnecessarily large outers in order to accommodate the additional required marks (and label(s) when transported by aircraft).

Proposal

7. Insert a new E code [E6] in 3.5.1.2 as follows:

Code	Maximum net quantity per inner packaging (in grams for solids and ml for liquids and gases)	Maximum net quantity per outer packaging (in grams for solids and ml for liquids and gases, or sum of grams and ml in the case of mixed packing)
E6	1	1000

8. Add the new E code to UN1170 (PGII), UN1219 (PGII), and UN1987 (PGII).

9. A consequential amendment would be to modify the guiding principles by inserting the new E code.

10. The Sub-Committee may wish to consider whether additional UN numbers (e.g., UN1266) should also be added.

Annex

