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**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****Fifty-fourth session**

Geneva, 26 November-4 December 2018

Item 2 (b) of the provisional agenda

**Recommendations made by the Sub-Committee on its fifty-first,  
fifty-second and fifty-third sessions and pending issues:  
explosives and related matters****Reassigning packing instructions PP67 and L1 to a new  
special provision****Transmitted by the expert from the United Kingdom\*****Introduction**

1. During the discussions on ST/SG/AC.10/C.3/2017/48 a subsidiary issue emerged relating to the understanding and application of PP67 and its companion L1 found in large packaging. The idea considered at the fifty-third session of the Sub-Committee was to move the text from the packing instructions to the additional requirements for explosive packaging in Chapter 4.1
2. However, some similar text already existed in Chapter 4.1 so the expert from the United Kingdom resolved to consider the matter further.

**Background**

3. Both PP67 in packing instruction P130 and L1 in packing instruction LP101 apply the same provision to the same articles. i.e. the wording of PP67 and L1 is identical.

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\* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14).

4. However the subject of the provision is not packaging but addresses large and robust articles. “Large and robust” are not defined as such but the articles being considered have to meet certain criteria regarding design and testing. Articles that meet the criteria may be consigned in an unpackaged state and as such do not have to meet the package test requirements of either chapter 6.1 or 6.6.

5. As indicated above large and robust items are not defined. At present there is a presumption that packaging limits apply, hence the duplication of the text in both P130 and LP101. In fact neither P130 nor LP101 set any limits. The packaging limits are only established in relation to tested and approved packaging by type in chapter 6.1 and via the definition of large packaging in chapter 1.2. Whilst this text does give a definitive net mass content boundary between the two packaging systems it does not specifically set a size limit on individual articles. Since the application of PP67 removes the need to use approved packaging there are no mass or dimensional limits set for these articles.

6. Examination of other PP and L provisions in other packaging/large packing instructions reveals that they generally relate to specific packaging variations within the generalisation of the packing instruction. For instance, in P131 there is PP68: “For UN Nos. 0029, 0267 and 0455, bags and reels shall not be used as inner packagings”. There are other items allocated P131 other than those in the PP and there are other types of inner packaging in P131 other than bags and reels.

### **Proposal 1**

7. Amend the dangerous goods list in Chapter 3.2 as follows:

Delete PP67 and L1 from all the entries in the dangerous goods list to which they are assigned and assign SP[xxx] to all of those entries instead.

8. Amend Section 4.1.4 as follows:

- Delete PP67 and associated text from P130
- Delete L1 and associated text from LP101

9. Amend Chapter 3.3 Special Provisions as follows:

Insert a new SP[xxx] with the same wording as either PP67 or L1.

### **Proposal 2 (alternative)**

10. Amend the dangerous goods list in Chapter 3.2 as follows:

Delete PP67 and L1 from all the entries in the dangerous goods list to which they are assigned and assign SP[xxx] to all of those entries instead.

11. Amend Section 4.1.4 as follows:

- Delete PP67 and associated text from P130
- Delete L1 and associated text from LP101

12. Amend Chapter 3.3 Special Provisions as follows:

Insert a new SP[xxx] with the same wording as either PP67 or L1 omitting the list of UN numbers.

13. It is unnecessary to cross reference the UN numbers to which the new SP[xxx] is assigned as it will only apply to those entries in the dangerous goods list which have SP[xxx] assigned.

## **Justification**

14. Users of the regulations will be able to consider the provisions relating to large and robust items without reference to the packing/large packing instructions which are not relevant at this stage. Where the requirements of the special provision cannot be met users will then move on to the packing instructions for compliance. This is a more user friendly and consistent approach to this requirement as special provisions generally relate to the items of dangerous goods.

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