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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

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Information on salvage in the transport document when using packagings not approved as salvage packagings

Transmitted by the expert from Germany*

Introduction

1. If dangerous goods are transported in salvage packagings, large salvage packagings or salvage pressure receptacles, this has to be indicated in the transport document, see 5.4.1.5.3. In the provisions on the use of salvage packagings, however, it is stipulated that not only salvage packagings that are type-approved and marked with the letter "T" but also other appropriate packagings or large packagings may be used for salvage transport operations.

2. The other packagings, however, are not mentioned in 5.4.1.5.3. Thus, the question arises of whether it needs to be indicated in the transport document also for these packagings that they are used for a salvage transport operation.

3. Germany believes that it is illogical to restrict the indication in accordance with 5.4.1.5.3 to cases where special salvage packagings are used. In particular when a packaging is used that is not marked with the letter T, it would make sense to have the information available during transport that it is used for a salvage transport operation. When selecting an appropriate packaging, the actual salvage situation also has to be considered, i.e. whether a substance is filled into another packaging or whether a package is packed.

^{*} In accordance with the programme of work of the Sub-Committee for 2019-2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

4. In order to make the provisions clear, 5.4.1.5.3 should be amended accordingly.

Proposal

5. Add the following sentence at the end of 5.4.1.5.3:

"This shall also apply where a larger size packaging or large packaging of appropriate type and performance level is used for the transport operation."