

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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Comment to document ST/SG/AC.10/C.3/2002/73 regarding packing instructions for UN 2014, UN 2015 and UN 3149

Submitted by ICCA

1. General

Having reviewed the document ST/SG/AC.10/C.3/2002/73, submitted by the expert from Germany and following up on the issue of minimum ullage, raised by ICCA in INF. 29 to the 21st session of the UNSCETDG, ICCA strongly supports the German proposal but would like to propose 2 amendments.

2. Proposals

Proposal 1

As packing instruction P501 does already require venting of packagings for UN 2015, there is neither a need to add to PP10 a reference to UN 2015 nor a need to enter PP10 in Chapter 3.2, column (9) for UN 2015.

As a consequence it is proposed:

- that PP10 be amended as follows:
PP10 “For UN 1791, UN 2014 and UN 3149, packing group II, the packaging shall be vented”
- that PP10 be entered in Chapter 3.2, column (9) for UN 2014 and UN 3149.

Proposal 2

ICCA is of the opinion, that the minimum ullage of 10 % for UN 2014 (as prescribed in PP29) is not justified and not necessary for safety reasons, as long as:

- the packagings are vented: this requirement is covered by allocating PP10 to UN 2014 (see proposal 1)
- the vent is so designed, that leakage of liquid and penetration of foreign matter is prevented under normal conditions of transport (as prescribed in 4.1.1.8).
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Indeed, in the philosophy of the rationalised approach, there is no reason why UN 2014 should be treated differently from other substances with similar properties in general and from other substances for which P504 is assigned in particular.

As a consequence it is proposed

- that PP 29 be deleted
- that PP 29 be removed from Chapter 3.2, column (9) for UN 2014
