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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
(Twenty-third session, 30 June-4 July 2003,
agenda item 4 (c))

PACKAGINGS

Packaging of waste aerosols sent for disposal and recycling

Transmitted by the expert from the United Kingdom

Background

1. The expert from the United Kingdom notes that around 90% of aerosols produced are for consumer products such as hairsprays, shaving foams, deodorants etc. The product, both contents and packaging, must be in an excellent condition to be acceptable to the consumer. This means that in production and at final inspection a number of aerosols have to be rejected for reasons such as;
 - dents and scratches on the aerosol dispensers;
 - faulty formulation of product,
 - out of date stocks and
 - leakages of aerosol.
2. Of approximately 1.5 billion aerosols manufactured in the United Kingdom each year, a few million are rejected. Such aerosols cannot be refilled. Manufacturers do not usually have facilities on site for their safe disposal and rejected aerosols must therefore be transported to special sites for safe disposal of the contents and recycling of the packaging materials.

3. The current packing provisions for aerosols, either as limited quantities in compliance with 3.4.2 or 3.4.3 or using P003, are inappropriate for these rejected aerosols because of the present capacity limitations. As can be seen from the accompanying photographs, many rejected aerosols will need to be moved together for disposal. It is only for such rejected aerosols that a need for transporting in a single packaging above those quantity limits arises. It does not appear that a new safety issue needs to be addressed. As such containers may contain some aerosols that could leak in transport, it is also necessary to address appropriate venting requirements. Special containers are already being placed on the market to move these rejected aerosols. The photographs appended to this paper show the types of container in use in North America, Germany and the United Kingdom. These containers exceed the limits for packing instructions and at present the use of IBCs and large packagings is not authorised in the Model Regulations.

Proposal

4. The expert from the United Kingdom believes that to solve this problem, the Model Regulations should be amended as follows;
 - a) Add LP02 to UN1950 in Column 8;
 - b) Create a new special packing provision L2 to be inserted below Packing Instruction LP02 and to read;

L2: For UN 1950 the large packaging shall be adequately vented to prevent a build up of pressure. Aerosols with a toxic content other than the propellant, see SP 63, shall not be carried under this packing instruction.
 - c) Add L2 to column 9 against UN 1950.

