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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-ninth session
Geneva, 3-12 (a.m.) July 2006
Item 7 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL
REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS**

Packing Instruction P650

Requirements regarding dry ice and liquid nitrogen

Transmitted by the expert from Austria

Introduction

1. The expert from Austria has noticed uncertainties among users with regard to the applicable requirements when dry ice or liquid nitrogen is used to keep the infectious substances of UN 3373 cold.
2. In P650 the following is stated under (9) (a):

“When dry ice or liquid nitrogen is used to keep specimens cold, all applicable requirements of these Regulations shall be met.”
3. This could be interpreted in a way that carriage of these cooling media would be treated in the same way as if they were shipped alone.

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4. For dry ice this means that it has to be classified under UN 1845 CARBON DIOXIDE, SOLID, of class 9 PG III and that it is subject to Chapter 3.3 Special Provision 297 thus in the given case being exempted from the shipping paper requirements.
5. For liquid nitrogen this would mean that it had to be classified under UN 1977 NITROGEN, REFRIGERATED LIQUID, of Division 2.2 and that it was not exempted from the shipping paper requirements.
6. On the other hand Special Provision 319 of chapter 3.3 which is valid for UN 3373 states that substances packed and marked in accordance with packing instruction P650 are not subject to any other requirements in these Regulations.
7. There are several possibilities to solve the problem. One could be to indicate in a more specific manner the provisions which shall in fact be applicable in this case.

Proposal

8. It is proposed to amend the beginning of (9) (a) of P650 as follows:

“When dry ice or liquid nitrogen is used to keep the substances cold, the applicable requirements of Chapter 3.3 Special Provision 297 shall be met for the dry ice and the packing requirements approved by the competent authority shall be met for the liquid nitrogen.” (Rest unchanged).

9. Furthermore it is proposed to modify Special Provision 319 as follows:

„Substances and where applicable dry ice or liquid nitrogen used to keep them cold, packed and marked in accordance with packing instruction P650 are not subject to any other requirements in these Regulations.”
