

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

Thirtieth session
Geneva, 4-12 (a.m.) December 2006
Item 2 (a) (ii) of the provisional agenda

PACKAGING REQUIREMENTS FOR BATTERIES

Packing instruction P 801 for UN Nos. 2794, 2795 AND 3028

Transmitted by the expert from Switzerland

SCOPE

This proposal aims to propose a change in the packaging requirements for batteries actually laid down in the Packing instruction P801.

Introduction

The experts are asked to consider if the following interpretation is correct and if some solution to the point can be found.

For the moment being the Packing instruction P801 for Nos. UN 2794, 2795 and 3082 is written as follows:”

The following packaging are authorized, provided the general provisions of **4.1.1** and **4.1.3** are met:

- (1) Rigid outer packagings;
- (2) Wooden slatted crates;
- (3) Pallets.

Referring to the whole section 4.1.1 implies also subsection 4.1.1.3, that is each packaging shall conform to a design type successfully tested in accordance with requirements of 6.1.5, 6.3.2, 6.5.6 or 6.6.5, as applicable.

We wonder what design type is applicable for Wooden slatted crates or Pallets. As it doesn't seem possible to ask for a design type for these kind of packaging, the experts are asked if it would not be possible to consider a solution as proposed hereafter.

Proposal

Change the text in P 801 as follows:

“The following packagings are authorized,:

- (1) Rigid outer packagings; provided the general provisions of **4.1.1** and **4.1.3** are met
- (2) Wooden slatted crates, provided the general provisions of **4.1.1**, except 4.1.1.3, and **4.1.3** are met;
- (3) Pallets. provided the general provisions of **4.1.1**, except 4.1.1.3, and **4.1.3** are met.”

Justification

In the new wording the need for a design type approval for Wooden slatted crates or Pallets is removed. We believe this reflects the intent of the rule maker and corresponds better to what can be done with such packaging.
