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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

Thirty-first session  
Geneva, 2-6 July 2007  
Item 6 of the provisional agenda

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

**Packing and marking of limited quantities**

**Communication from the expert from France**

**Introduction**

1. The proposals in this document, although they apply to limited quantities, are essentially separate from issues relating to the harmonization of requirements for limited quantities. They are aimed at solving practical problems that occur identically in different modes of transport where there is no fundamental difference between the current versions of the various regulations.
2. Proposal No. 1 is aimed at clarifying what is meant by the term package as used in chapter 3.4. In practice, inner packagings, bottles for example, are sometimes placed in boxes or other types of packing, which are themselves grouped in an outer packaging. The current wording gives rise to problems of interpretation regarding the packaging to which the chapter's later provisions apply: the labelling requirement, for example. With the introduction of the concept of intermediate packaging, only the outermost packaging is to be considered as the package.

3. Proposal No. 2 is a consequence of the use of intermediate packaging batched in shrink-wrapped trays. The usual restrictions for glass receptacles and other fragile materials are no longer justified when the intermediate packaging is of the strength mentioned in 3.4.2.

4. Proposal No. 3 is aimed at exempting goods packaged in limited quantities from the provisions on overpacks in 5.1.2. Such goods are currently not exempt. Strictly speaking, in cases where an overpack is used for limited quantities, it should itself be labelled in accordance with part 5, even though the packages inside it are not. The proposal also introduces alternative provisions based on the marking specified in 3.4.8.

## Proposals

### Proposal No. 1

5. Amend 3.4.2 as follows (amendments are underlined):

3.4.2 Dangerous goods shall be packed only in inner packagings placed, when appropriate in intermediate packagings, and subsequently in suitable outer packagings ... (the rest of the text remains unchanged).

### Proposal No. 2

6. Amend 3.4.3 as follows (amendments are underlined, deletions are struck out):

3.4.3 Shrink-wrapped or stretch-wrapped trays meeting the conditions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 are acceptable as outer packagings for articles or inner packagings containing dangerous goods transported in accordance with this Chapter. When ~~except that~~ inner packagings that are liable to break or be easily punctured, such as those made of glass, porcelain, stoneware or certain plastics, are used, they shall be placed in intermediate packagings meeting the provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8, and be so designed that they meet the construction requirements of 6.1.4. ~~shall not be transported in such packagings.~~ The total gross mass of the package shall not exceed 20 kg.

### Proposal No. 3

7. Add a new paragraph, 3.4.10, as follows:

3.4.10 When packages are placed in an overpack, 5.1.2 need not apply. However, the marking called for in 3.4.8 shall be placed on the overpack unless the marks indicating the nature of all the dangerous goods contained in the overpack are visible.

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