



Secretariat

Distr.
GENERAL

ST/SG/AC.10/C.3/2007/21
12 April 2007

Original: ENGLISH

**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 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Packing Instruction 804 for UN 1744 (Bromine)

Transmitted by the expert from the United States of America

Background

1. At its 29th session, the Sub-Committee adopted a new packing instruction for Bromine based on a proposal from the expert from the United Kingdom (see ST/SG/AC.10/34/Add.1 and proposal ST/SG/AC.10/C.3/2006/36 as amended by UN/SCETDG/29/INF.71). The intent of the proposal as stated in ST/SG/AC.10/C.3/2006/36 was to “rationalise the packing instructions for bromine UN1744, given that this substance is commonly packed in pressure vessels that do not conform to the current P601”.

2. It has been noted that in addition to clarifying the requirements for pressure receptacles, however, the proposal also removed the requirement that an intermediate receptacle, together with cushioning and absorbent material, be used between the inner receptacle and the outer package when glass inner receptacles are used. The intermediate receptacle together with cushioning and absorbent material is considered important for protection of fragile glass inner receptacles and also to provide additional containment of the product in the event of leakage. It appears that the text proposed in ST/SG/AC.10/C.3/2006/36 as amended by UN/SCETDG/29/INF.71 may have inadvertently originated from the 13th revised edition of the UN Recommendations on the Transport of Dangerous Goods. In addition to removing the requirement for an intermediate packaging, which was also in the 13th revised edition, the format GE.07-

and layout of the text used was not the most recent text. The Sub-Committee will recall that for the 14th revised edition, the relevant text was specifically amended to clarify the packaging requirements based on ST/SG/AC.10/C.3/2004/82 (Germany) as amended by UN/SCETDG/26/INF.26 (Germany/USA). However these clarifications appear to have inadvertently been lost during the development of Packing Instruction P804.

3. It is proposed that the text of P804 be revised to reinstate the requirement for the use of an intermediate packaging when glass inner receptacles are used and to be consistent with the clarified text of the 14th revised edition.

Proposal

Amend the first paragraph of P804 to read as follows:

~~(1) — Combination packagings with a maximum gross mass of 25 kg, consisting of one or more glass inner packaging(s) with a maximum capacity of 1.3 litres each and filled to not more than 90% of their capacity; the closure(s) of which shall be physically held in place by any means capable of preventing back-off or loosening by impact or vibration during transport, together with cushioning and absorbent material sufficient to absorb the entire contents of the glass inner packaging(s), further packed in 1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4C2, 4D, 4F, 4G or 4H2 outer packagings.~~

- (1) **Combination packagings with a maximum gross mass of 25 kg, consisting of**
- **one or more glass inner packaging(s) with a maximum capacity of 1.3 litres each and filled to not more than 90% of their capacity; the closure(s) of which shall be physically held in place by any means capable of preventing back-off or loosening by impact or vibration during transport, individually placed in**
 - **metal receptacles together with cushioning and absorbent material sufficient to absorb the entire contents of the glass inner packaging(s), further packed in**
 - **1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4C2, 4D, 4F, 4G or 4H2 outer packagings.**
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