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

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LISTING, CLASSIFICATION AND PACKING

Special Packing Provisions for goods of Class 1

Transmitted by the Expert from Australia

SCOPE
This proposal recommends amendments to section 4.1.5.5 to clarify the intent of the testing requirements for Class 1 goods.

Introduction

1. The Australian Forum of Explosives Regulators (AFER) is updating the Australian Explosives Code (AEC) to reflect the 15th Edition of the UN Model Regulations (UN15). As part of this process, the requirements of UN15 have been examined with a view to harmonising as closely as possible.

2. An issue has been identified with section 4.1.5.5 regarding the prohibition on the use of PGI standard metal packages, including IBCs and large packages (LPs), for Class 1 goods to prevent “unnecessary confinement”.

Issues

3. Section 4.1.5.5 could potentially allow the use of metal packagings which have only been tested and approved to the requirements of PGII, but if tested would satisfy the requirements for PGI. Therefore, the use of such packagings may be inconsistent with the objective of minimising “unnecessary confinement”.

4. The differences in testing requirements for PGI and PGII are as follows:

Packages (6.1.5)	: Drop height	PGI	= 1.8m or (d x 1.5m)
		PGII	= 1.2m or (d x 1.0m)
	: Leakproof test	PGI	= not less than 30kPa
		PGII	= not less than 20kPa
	: Hydraulic test	PGI	= additional 250kPa test
IBCs (6.5.6)	: Drop height	PGI	= 1.8m
		PGII	= 1.2m or (d x 1.0m)
	: Topple height	PGI	= 1.8m
		PGII	= 1.2m
LPs (6.6.5)	: Drop height	PGI	= 1.8m or (d x 1.5m)
		PGII	= 1.2m or (d x 1.0m)

5. The main difference between the PGI and PGII requirements for IBCs and LPs is drop height. For packages, there is also an increase in test pressure for the leakproofness test and additional requirements for the hydraulic test. A metal IBC or LP passing the PGII drop height could in many cases also pass the PGI drop height.

6. The Australian Expert considers that if the intent of 4.1.5.5 is that the package must not pass the PGI test criteria to prevent “unnecessary confinement”, then this needs to be explicitly stated.

Recommendations

7. The Australian Expert recommends that the last sentence of section 4.1.5.5 be amended to read:

> “*To avoid unnecessary confinement, metal* ***packages shall not be capable of meeting the test criteria of Packing Group I.”***

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