

**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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Item 5 of the provisional agenda

**Miscellaneous proposals of amendments to the Model Regulations  
on the Transport of Dangerous Goods**

**Comments on P302 in ST/SG/AC.10/C.3/2010/26 “Revision of  
various specialist packing instructions in the Model  
Regulations”**

**Transmitted by the European Council of the Paint, Printing Ink and  
Artists Colours Industry (CEPE)**

**Introduction**

1. CEPE notes the proposals in ST/SG/AC.10/C.3/2010/26 to amend inconsistencies in the packing instructions. However, we have concerns about the proposals to amend P302. Although we recognize that it may be helpful to users to have a list of authorized types of outer packagings for the combination packs, the way that the revised text is laid out implies that the inner packagings, rather than just the combination pack as a whole, shall meet the packing group II or III performance level. This is not currently required and would be technically difficult to achieve; there is no safety justification for any such additional requirement.

**Proposal**

2. In order to clarify matters and retain the status quo, we propose that “Combination” is inserted at the beginning of the last sentence in the proposed new text, so that it reads as follows:

“Combination packagings shall conform to the packing group II or III performance level according to the criteria for Class 3 applied to the base material.”