

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

24 November 2010

Thirty-eighth session

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Item 4 of the provisional agenda

Listing, Classification and Packing

Packagings with a capacity exceeding 450 liters - 6.1.1.1 (e)

Transmitted by Austria and Germany

Introduction

1. There are existing packagings, especially for articles, which are not designed for mechanical handling (1.2.1 Definitions) and have a capacity of more than 450 litres (e.g. fibreboard boxes used for air-bags with a special shape, gross mass about 25 to 30 kg, box dimensions app. 2300 x 800 x 300 mm = capacity 552 litres).
2. For articles and solid substances the limit of 400 kg net mass is regarded as adequate. The limit of 450 liters seems to be related to liquid substances.
3. Testing of boxes according to Chapter 6.1 is more severe than tests for large packagings in chapter 6.6. So it would be possible to classify these packagings as large packagings of chapter 6.6, with no or minimum additional testing.
4. Some of the articles used in the air-bag industry have UN Numbers without an entry for large packagings in the dangerous goods list, column 8. If these packagings are regarded as large packagings it might be necessary to add LP101 to some UN Numbers.

Proposal

6.1.1.1 (e) Amend to read as follows:

- (e) Single packagings **for liquids** with a capacity exceeding 450 litres

Justification

5. There are many existing packagings, especially for articles, **which are not designed for mechanical handling** and have a capacity of more than 450 litres and the marking as boxes will ensure a more stringent testing procedure.
6. There is no safety risk, because the articles are tested with these packagings.
7. This is no formal proposal, so we will submit a formal proposal at the next session in line with the comments received from the committee.