



**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-ninth session**

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Item 3 (c) of the provisional agenda

Listing, classification and packing: Miscellaneous**Packing instruction P906****Transmitted by the expert from Switzerland¹****Introduction**

1. We were prompted to take a look at packing instruction P906 by a question concerning the transport for disposal of condensers classified under UN No. 2315. This led us to make the following observation:
2. The packing instruction authorizes packagings that comply with packing instructions P001 or P002, for liquids and solids containing or contaminated with polychlorinated biphenyls (PCBs) or polyhalogenated biphenyls or terphenyls (P906, para. (1)).
3. Under P906, paragraph (2), transformers, condensers and other devices may also be carried in packagings capable of holding, in addition to the device itself, at least 1.25 times the volume of the PCBs or polyhalogenated biphenyls or terphenyls present in the device. In such cases, the packagings do not need to comply with packing instructions P001 or P002.
4. In the context of the transport of condensers for disposal, the question was raised of whether it should be mandatory to apply paragraph (2) of P906 rather than paragraph (1).
5. A review of the regulation's history showed that, under marginal 2905 in ADR 1999, these devices could also be transported in approved packaging without absorbent material.

“2905

¹ In accordance with the programme of work of the Sub-Committee for 2011–2012 approved by the Committee at its fifth session (ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

- (1) Apparatus of 3° shall be packed:
 - (a) In leakproof packagings; or
 - (b) In leakproof containers.
- (2) Apparatus of 3° may also be carried in leakproof receptacles (containment vessels) which must be able to hold, in addition to the apparatus, at least 1.25 times the substances of 2° (b) present in the apparatus. There must be sufficient inert material in the receptacles to absorb at least 1.1 times the substances of 2° (b) which are contained in the apparatus. The apparatus and the receptacles shall be so designed as to avoid any leak of liquid under normal conditions of carriage.”

6. This possibility of using packagings that comply with the regulations (according to packing instructions P001 and P002) without the need for absorbent material seems to have disappeared when ADR was restructured and the text was recast as packing instruction P906. Paragraph (1) of the packing instruction mentions only “liquids and solids containing (...) PCBs or polyhalogenated biphenyls or terphenyls”. There is no reference to “devices” (transformers, condensers and other devices mentioned in paragraph (2)). The wording of the packing instruction would thus seem to prohibit the use of packagings that comply with packing instructions P001 or P002 for the “devices” mentioned in paragraph (2), which, for no apparent reason, must be placed in packagings that do not conform to a design type.

7. It is difficult to understand why this is the case. Packaging that does not conform to the regulations would not seem to offer better leakproofness than packaging that has been tested and approved under the regulations. It would not seem that material that absorbs 1.1 times the volume of liquid contained would ensure a higher level of safety than that offered by packaging approved for the transport of these dangerous goods.

8. The use of absorbent material in the proportions set out in paragraph (2) would make the transport of condensers for disposal more expensive and complicate their disposal, without ensuring a higher level of safety than transport in packagings in accordance with packing instructions P001 or P002.

9. For these reasons, it is apparently necessary to rewrite the text of packing instruction P906 to authorize the transport of transformers, condensers and other devices in packagings in accordance with packing instructions P001 or P002.

Proposal

10. In packing instruction P906, paragraph (1), at the beginning of the text, replace “For liquids ...” by “For transformers, condensers and other devices, and for liquids ...”.

11. In packing instruction P906, paragraph (2), modify the beginning of the text, “For transformers and condensers and other devices: Leakproof packagings ...”, as follows:

“Transformers, condensers and other devices may also be transported in leakproof packagings ...”