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**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****Forty-first session**

Geneva, 25 June – 4 July 2012

Item 3 (b) of the provisional agenda

**Listing, classification and packing: miscellaneous****Proposal of amendment to Packing Instructions P602****Transmitted by the International Council of Chemical Associations  
(ICCA)****Introduction**

1. At the 39th session of the Sub-Committee, a proposal in informal document INF.59 was adopted, allowing the use of supplementary packaging in a new subsection 4.1.1.5.2:

“Use of supplementary packagings within an outer packaging (e.g. an intermediate packaging or a receptacle inside a required inner packaging) additional to what is required by the packing instructions is authorized provided all relevant requirements are met, including 4.1.1.3, and, if appropriate, adequate cushioning is provided to protect against movement within the packaging” (see ST/SG/AC.10/C.3/78, para. 44 and annex II).

2. Consequently for substances, assigned to P602, a glass receptacle inside the required inner packaging can be used provided that this supplementary packaging is surrounded by cushioning material.

3. However P602 (2) limits the capacity of the inner packaging to 5 litres which means that the available capacity for the dangerous good is reduced by the amount of cushioning material. Therefore only smaller receptacles can be used inside an inner packaging so that the amount of dangerous good present in the inner packaging will be (far) less than the current maximum amount that is allowed to be present inside each inner packaging (i.e. 90 % of the maximum capacity of the inner packaging = 4,5 l).

4. The above mentioned issue has been visualised in the annex to this document.

## Proposal

### Alternative 1

5. However, in order to ensure that, when a receptacle is used inside an inner packaging, the maximum amount of dangerous good present inside each inner packaging can be equal to the present maximum allowed amount, it is proposed to amend P602 (2) as follows (new text is underlined):

“Combination packagings consisting of metal **or plastics** inner packagings individually packed with absorbent material sufficient to absorb the contents and inert cushioning material in 1A1, 1A2, 1B1, 1B2, 1N1, 1N2, 1H1, 1H2, 1D, 1G, 4A, 4B, 4N, 4C1, 4C2, 4D, 4F, 4G or 4H2 outer packagings with a maximum gross mass of 75 kg. Inner packagings shall not be filled to more than 90% of their capacity. The closure of each inner packaging shall be physically held in place by any means capable of preventing back-off or loosening of the closure by impact or vibration during transport. Inner packagings shall not exceed 5 litres in capacity.

An inner packaging may exceed 5 litres in capacity provided that

- A receptacle inside the required inner packaging is used as a supplementary packaging according to 4.1.1.5.2.
- The capacity of the supplementary packaging does not exceed 5 litres in capacity, and
- The supplementary packaging is not filled to more than 90% of its capacity”

6. The addition of “or plastics” was adopted at the 39<sup>th</sup> session of the Sub-Committee on the Transport of Dangerous Goods based upon the proposal in informal document INF.59.

### Alternative 2

7. Alternatively, the issue could be addressed in a more general way by amending 4.1.1.5.2 so that it applies to all packing instructions, where applicable. It is therefore proposed to add the following sentence to the new 4.1.1.5.2 (new text underlined).

“4.1.1.5.2. Use of supplementary packagings within an outer packaging (e.g. an intermediate packaging or a receptacle inside a required inner packaging) additional to what is required by the packing instructions is authorized provided all relevant requirements are met, including 4.1.1.3, and, if appropriate, adequate cushioning is provided to protect against movement within the packaging.

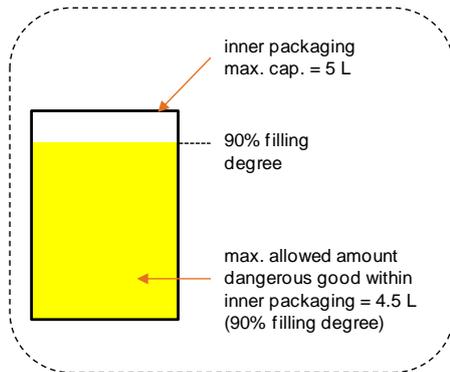
For supplementary packagings that are used inside required inner packagings, volume or filling limits otherwise applicable to the required inner packagings, shall be applicable to the supplementary packagings.

Therefore the maximum capacity of the required inner packaging may be exceeded to accommodate the supplementary packaging and cushioning material.”

## Annex

### Visual presentation of the issue

Requirements of P602 (2) **without** a receptacle (supplementary packaging) inside an inner packaging



Requirements of P602 (2) **with** a receptacle (supplementary packaging) inside an inner packaging

