

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

26 June 2013

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Item 2 (f) of the provisional agenda

Explosives and related matters: miscellaneous

Comments on INF.32 from AEISG on the Proposal to have the UN Packing Group for UN No 3375 reviewed and possibly changed from PG II to PG III

Transmitted by the Expert from Switzerland

1. The change of PG III to PG II is the result of the discussion of a number of documents:
2. The discussion in ST/SG/AC.10/C.3/2001/6 is based on ST/SG/AC.10/2000/20 and several informal documents. In turn the discussion in ST/SG/AC.10/2000/20 is based on ST/SG/AC.10/C.3/2000/21 and INF.47. In this informal paper the expert of the United States explains why PG III should not be considered:
 - (a) “Whilst it is normal practice that substances in PGIII are permitted to go as limited quantities, the entry in column (7) is “none”.”
 - (b) “If the inter-sessional working group adopted PGIII to restrict over-confinement the entry does NOT achieve this, as a package tested to PGI can apply a PGIII mark. The solution here is to apply Additional Requirements in the packing instruction.”
 - (c) “PGIII substances are normally allocated to P001 or P002.”
3. Additionally in the report of the ad hoc working group, submitted as INF.44 at the nineteenth session, was noted
 - (a) “the working group reviewed 2001/6 and it was decided to remove SP306 from the entry UN3375 since this special provision was also valid for UN1942 and UN2067 and that the proposed change to special provision 309 took care of this. The packing instruction was discussed and since the proposed packing instruction was not in line with the standard principles used by the Committee to develop packing instructions. Also, the real need for such an instruction was questioned. It was decided retain P099.”

Conclusions

PG II is justified.
