

## **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**

**16 June 2014**

### **Forty-fifth session**

Geneva, 23 June – 2 July 2014

Item 4 (c) of the provisional agenda

**Listing, classification and packing: miscellaneous**

## **Comments on ST/SG/AC.10/C.3/2014/7**

### **Transmitted by the European Aerosol Federation (FEA)**

1. In document ST/SG/AC.10/C.3/2014/7 the expert from the United Kingdom made proposals to amend the special packing provision L2 for waste aerosols.
2. FEA would like to suggest an alternative to the UK approach by introducing a new Large Packaging instruction for aerosols, in the same spirit of Packing Instruction P207.
3. The possibility to use Large Packagings of LP02 for aerosols with a packing group performance level III is in the Model Regulations since their 14th edition. This means that they are allowed for example since ADR 2007 and the IMDG Code 33rd Amendment 2006. FEA would like to make experts and regulators aware of the fact, that industry would need sufficient transitional periods for existing Large Packagings to be used for the transport of aerosols. Especially for waste collection many rigid metal Large Packagings are used today.

## Proposal

3. Include the following new Large Packaging provision LPXY:

LPXY	PACKING INSTRUCTION	LPXY
<b>This instruction applies to UN No. 1950.</b>		
<p>The following large packagings are authorized for aerosols, provided that the general provisions of <b>4.1.1</b> and <b>4.1.3</b> are met:            Rigid large packagings conforming to the packing group II performance level, made of:</p> <ul style="list-style-type: none"> <li>steel (50A);</li> <li>aluminium (50B);</li> <li>metal other than steel or aluminium (50N);</li> <li>rigid plastics (50H);</li> <li>natural wood (50C);</li> <li>plywood (50D);</li> <li>reconstituted wood (50F);</li> <li>rigid fibreboard (50G).</li> </ul>		
<b>Special Packing provision</b>		
<b>L2</b>	<p>The large packagings shall be designed and constructed to prevent dangerous movement of the aerosols and inadvertent discharge during normal conditions of transport. For waste aerosols carried in accordance with special provision 327, the large packagings shall have a means of retaining any free liquid that might escape during carriage, e.g. absorbent material. The large packagings shall be adequately ventilated to prevent the creation of flammable atmosphere and the build-up of pressure.</p>	

4. Consequential amendments:
- In Chapter 3.2 for UN1950 replace LP02 with LPXY
  - In Chapter 3.3 SP327 replace LP02 with LPXY
  - In LP02 delete L2
5. For a transitional period:
- Add “XXX” in Chapter 3.2 column (6) for UN1950 and a special provision “XXX” in chapter 3.3:
- “XXX Large packagings conforming to the packing group III performance level as prescribed in the 18th revised edition of the UN Recommendations on the Transport of Dangerous Goods, Model Regulations, may be used until 31 December 2022.”