



**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-seventh session**

Geneva, 22 – 26 June 2015

Item 3 of the provisional agenda

Listing, classification and packing**Solids for transport which are filled as liquids and solidify
during or before transport****Submitted by the Dangerous Goods Advisory Council ¹****Introduction**

1. It is not uncommon for dangerous goods which meet the definition of “solid” in section 1.2.1 of the Model Regulations to be in a liquid state when packed and to then solidify during or before transport.
2. Paragraph 4.1.1.13 of the Model Regulations states that “Packagings, including IBCs, used for solids which may become liquid at temperatures likely to be encountered during transport shall also be capable of containing the substance in the liquid state.” Consequently consignors will often use packagings of a type typically associated with and marked for the transport of liquid dangerous goods such as 1A1, 1B1, 1H1, and others.
3. However, there is little guidance available other than the fact that Packing instruction P002 (Solids) lists such packagings as being authorized. This has led to uncertainty on the part of consignors, carriers and enforcement officers as to the parameters of the performance characteristics required of the packagings in such circumstances, causing delays in transport and other complications.

¹ In accordance with the programme of work of the Sub-Committee for 2015-2016 approved by the Committee at its seventh session (refer to ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

4. DGAC would suggest that the text in 4.1.1.13 be supplemented with some guidance on when a liquid marked drum may be used. The proposal below is attempting to ensure that where a liquid marked drum is used the consignor must ensure that the substance cannot exceed any of the parameters in the UN mark on the drum selected.

Proposal

5. Add a new sub-paragraph 4.1.1.13.1 as follows:
“4.1.1.13.1 Where a substance is either filled in a liquid state or is a solid which could become liquid during transport, a packaging marked for liquids may be used provided that the contents in a liquid state are within the parameters shown in the liquid mark according to 6.1.3.”
 6. A consequential amendment should be to insert a sentence in 4.1.3.4 as follows:
“The use of liquid marked packagings for certain solids is addressed in 4.1.1.13.1.”
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