



**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****Fiftieth session**

Geneva, 28 November – 6 December 2016

Item 6 of the provisional agenda

**New proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods****Packagings (Including IBCs and large packagings)****Maximum capacity of composite packagings 6HH1 for
packing group I****Transmitted by the International Confederation of Plastics Packaging
Manufacturers (ICPP)****Introduction**

1. Packing instruction P001 limits the maximum capacity for plastic drums (1H1) of packing group I (PG I) to 250 l. PG I provides also a maximum capacity of 250 l for certain composite packagings, i.e. plastics receptacles in steel or aluminium drums (6HA1 and 6HB1). Surprisingly, for composite packaging plastics receptacle in plastic drums (6HH1) PG I only allows a maximum capacity of 120 l. This contradiction between the maximum capacity of a plastics drum 1H1 and a plastics drum with plastics inner receptacle (6HH1) can possibly be explained by history of the Model Regulations but not by safety requirements.

2. The reason why this contradiction remained undiscovered for such a long time might be the fact that there has not been any economic interest for 6HH1 drums of PG I with more than 120 l so far, because these drums are much more expensive than 1H1 drums of packing group I. Meanwhile there is a demand for such drums for high purity products of PG I, which would justify the economic production of 6HH1 drums higher than 120 l.

3. The test report reproduced in informal document INF.3 shows that such a 6HH1 drum with a capacity of 220 l meets all design type requirements for PG I.

4. Therefore P001 should be modified in a way that the maximum capacity of 6HH1 drums for PG I corresponds to the maximum capacity of plastics drums 1H1 respectively composite packaging 6HA1 or 6HB1.

Proposal

5. Revise P001 in chapter 4.1.4.1 for composite packagings as follows (modifications are marked):

<i>Composite packagings</i>	<i>Packing group I</i>
<ul style="list-style-type: none"> ▪ Plastics receptacle in steel, aluminium or plastics drum (6HA1, 6HB1, 6HH1) 	250 l
<ul style="list-style-type: none"> ▪ Plastics receptacle in fibre, plastics or plywood drum (6HG1, 6HH1, 6HD1) 	120 l
.....
