



**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****Fifty-first session**

Geneva, 3-7 July 2017

Item 3 of the provisional agenda

Listing, classification and packing**Application of packing instruction P003 to large articles****Submitted by the expert of Germany*****Introduction**

1. Packagings subject to packing instruction P003 need not to be type approved. However, they shall be so designed that they meet the construction requirements of 6.1.4. Section 6.1.4 restricts the maximum net mass permitted in a packaging to 400 kg.
2. There are large articles, e.g. UN 3164 ARTICLES, PRESSURIZED, PNEUMATIC or HYDRAULIC (containing non-flammable gas), subject to P003, having a mass exceeding 400 kg. Actually, the Model Regulations do not provide a possibility to transport such articles within the scope of the regulations, not even with competent authority approval.
3. At its fiftieth session, the Sub-Committee accepted new provisions for articles containing dangerous goods. New entries were included in the dangerous goods list and a packing instruction P 006 was assigned to these entries. P 006 stipulates different options for packagings, paragraph 1 lists type approved packagings, paragraph 2 allows the use of strong outer packagings and unpackaged transport. These options were included because the mass limits for packagings are a typical problem occurring in the context of the transport of articles. This is also the problem for pressurized articles. For example, German authorities got a request concerning the transport of components of control systems for oil

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, paragraph 14).

industry. The components (test pressure 690 bar, working pressure 345 bar) had to be shipped with 2 -5 bar nitrogen to avoid corrosion, their weight was 2000 kg.

4 In the opinion of the German expert, the Model Regulations should provide also a regular possibility to transport large articles of UN 3164 exceeding 400 kg. This could be achieved by adding a special packing provision which allows the use of outer packaging or unpackaged transport under the same conditions as applicable to the new UN Number 3538 ARTICLES CONTAINING NON-FLAMMABLE, NON TOXIC GAS, N.O.S.

Proposal

It is proposed to insert a special packaging provision PPxx in P003 as follows:

“In addition, for strong robust articles assigned to UN 3164 the following packagings are authorized provided the that the receptacles within the articles meet the requirements of section 4.1.6 and chapter 6.2 as appropriate or the articles are capable of providing an equivalent level of protection as packing instruction P200:

- Strong outer packagings constructed of suitable material and of adequate strength and design in relation to the packaging capacity and its intended use. The packagings shall meet the provisions of 4.1.1.1, 4.1.1.2, 4.1.1.8 and 4.1.3 in order to achieve a level of protection that is at least equivalent to that provided by Chapter 6.1.
 - Articles may be transported unpackaged or on pallets when the dangerous goods contained in the article are afforded equivalent protection by the article in which they are contained.”
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