



**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-second session**

Geneva, 27 November-6 December 2017

Item 3 of the provisional agenda

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

1. At the fifty-first session, document ST/SG/AC.10/C.3/2017/12, proposing to include a possibility to transport large articles of UN 3164 in packagings not meeting the specifications of Chapter 6.1 or unpackaged, was considered. Several delegations expressed their support for the intention of the proposal, but several comments were made about the way the question should be addressed and the details of the proposal (see ST/SG/AC.10/C.3/102, para. 39).

Background

2. 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.

3. 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.

* 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).

4 Document ST/SG/AC.10/C.3/2017/12 suggested 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, see paragraph 2 of P 006. Several experts proposed to merge the proposed new PP with the existing PP 32, others pointed out that the new option should be limited to articles with a mass exceeding 400 kg.

5 After further consideration, it can be concluded that the best solution would be to apply PP 32 also to 3164. Paragraph 2 of P 006 contains rather specific requirements for the receptacles containing the gas which might be not appropriate for pressurized articles. The gas may be contained in pressure pipes and pressure receptacles of the article, the article itself may contain the gas, e.g. gas pressure shock-absorbers or the gas is applied before or during transport to prevent corrosion.

6. As a limitation to articles with a mass exceeding 400 kg would lead to stricter provisions for UN 2857 and 3358, two options are proposed:

- Option 1: Apply PP 32 also to UN 3164.
- Option 2: Limit PP 32 to articles with a mass exceeding 400 kg and apply the amended PP 32 also to UN 3164.

Proposal

Option 1:

In the dangerous goods list, for UN 3164, in column 9 insert PP32.

In P 003, amend PP 32 to read as follows:

“PP32 UN Nos. 2857, 3164 and 3358 may be transported unpackaged, in crates or in appropriate overpacks.”

Option 2:

In the dangerous goods list, for UN 3164, in column 9 insert PP32.

In P 003, amend PP 32 to read as follows:

“PP32 For UN Nos. 2857, 3164 and 3358, machines and articles with a mass exceeding 400 kg may be transported unpackaged, in crates or in appropriate overpacks.”
