

Agenda item 2 (b)

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS
(Twentieth Session, Geneva 7-16 December 1998)

PACKAGING INSTRUCTIONS
Comments on Information Paper 5 submitted by the
International Maritime Organization

Transmitted by the Expert from the United Kingdom

Background

Information Paper 5 submitted by the International Maritime Organization reports on the outcome of consideration by the DSC Sub-Committee's Editorial and Technical Group (E&T Group) of the outcome of the September 1998 Frankfurt UN Working Group on Packing Instructions.

Having regard to subsequent written editorial comments received from participants in the Frankfurt UN Working Group and to the discussions held in the E&T Group a number of editorial corrections were made and inconsistencies removed from the final versions of the annexes to the Report of the Frankfurt Working Group (ST/SG/AC.10/1998/16) submitted to the UN Committee of Experts.

As a result, the expert from the United Kingdom believes that a number of issues raised by IMO in Information Paper 5 have already been satisfactorily resolved. The expert from the United Kingdom also believes that for a number of other points raised by IMO there are valid reasons not to make the changes proposed by IMO. The following commentary addresses each point raised in the IMO paper.

Commentary on IMO proposals

INF.5 Paragraph 6:

- P800 Agreed - amended in final version submitted to UNCOE.
- P801 Not adopted in final version submitted to UNCOE as RID/ADR requires PGIII.

INF.5 Paragraph 7:

- SP11 The IMDG Code already permits 5M1 bags for UN1362. US/UK did not support in E&T.
- SP14 Agreed - amended in final version submitted to UNCOE.
- SP29 Agreed - amended in final version submitted to UNCOE.

The following SPP numbers do not appear in the paper to UNCOE:

- SP66 Not necessary. P002 inner packagings note 3 indicates paper and fibre packagings shall not be used for PGI substances.
- SP67 As written this would apply to PGII and PGIII. Differing views were expressed in E&T Group. UK accepts for PGII but not for PGIII.
- SP68 Already addressed in SP29.
- SP69 If adopted this would apply to PGI, II and III. The UK would favour application to PGI and PGII only.

- SP70 Addressed for UN2590 in PXC. UN2212 is probably an omission and needs to be corrected in the paper submitted to UNCOE.
- SP71 Addressed in PXD
- SP72 Addressed in PXB
- SP73 The UK does not agree, as it could apply to PGII or III.
- SP74 Unnecessary as UN1365 is in P003 and UN testing is not required.
- SP75 UN1376 is assigned to P003 this is not strictly necessary, but could be accepted.
- SP76 There are no such restrictions in RID/ADR and the UK did not support in E&T.
- SP77 There are no such restrictions in RID/ADR and the UK did not support in E&T.

INF.5 Paragraph 8:

Class 4.1 An additional Special Packing Provision could be added to P409 to the effect that "UN1353..... are not permitted in bags". Alternatively have a new Packing Instruction P409A, without bags, could be added.
The UK does not believe that this is appropriate for UN1353 nitrocellulose soaked rags.
There appears to be a typographical error in the list of UN numbers shown as UN 1388 and UN 4148 do not appear in the Dangerous Goods List.

Class 4.2 Same solution as suggested for Class 4.1 above.

UN2870 The current proposed inner packaging limit in P400 is 1 litre in indent (ii) and 4 litres in indent (iii).

UN3200 etc This proposal would require classifying these UN numbers in a new way. The UK believes this should be considered further in the next biennium.

INF.5 Paragraph 9:

- .1 Agreed - amended in final version submitted to UNCOE.
- .2 Agreed - amended in final version submitted to UNCOE.
- .3
- .4 The UK does not agree.
- .5 The UK does not agree.
- .6 The UK does not agree.
- .7 Should be considered further.
- .8 Agreed - amended in final version submitted to UNCOE.
- .9 The UK does not agree.

INF.5 Paragraph 10:

Packagings

- UN1044 The UK believes it would be unrealistic to limit fire extinguishers to 55kg or 125kg. Ship/aircraft systems will far exceed this limit.

- UN2857 Addressed in PXB
- UN1194 Addressed in P099
- UN1222 Could go to P099 in the UN list.
- UN1261 Could go to P099 in the UN list.
- UN1865 Could go to P099 in the UN list.
- UN3256 Could go to P099 in the UN list.

- UN1649 The UK believes that this should stay in P001 as this proposal is more restrictive than RID/ADR.

- UN1680)
- UN1689) Agreed - amended in final version submitted to UNCOE
- UN1694)

- UN3281 This would apply to all Packing Groups. The UK believes it should apply only to PGI.

- UN3124)
- UN3125) Could go to P099 in the UN list
- UN3223)

- UN1590) Agreed - amended in final version submitted to UNCOE
- UN1597)

- UN1851 Agreed - amended in final version submitted to UNCOE

- UN1812) Agreed - amended in final version submitted to UNCOE
- UN2937)

- UN1777 The UK believes that this should be referring to UN1798

- UN2444 Agreed - amended in final version submitted to UNCOE

- UN3095)
- UN3301) Could go to P099 in the UN list
- UN3096)
- UN3094)

- UN1835) Agreed - amended in final version submitted to UNCOE
- UN2949)

- UN2215 Agreed - amended in final version submitted to UNCOE
- UN2511 Agreed - amended in final version submitted to UNCOE
- UN2834 Agreed - amended in final version submitted to UNCOE
- UN3257 Agreed - amended in final version submitted to UNCOE
- UN1517 Agreed - amended in final version submitted to UNCOE
- UN3181 UK does not agree - retain P002
- UN1366 Agreed - amended in final version submitted to UNCOE.
- UN1370 Agreed - amended in final version submitted to UNCOE in P403A.
- UN2793 Agreed - amended in final version submitted to UNCOE.

IBCs

- UN1390 UK does not agree - retain IBC07
 - UN1456 Packing Group II is assigned to UN IBC05
 - UN1472 UN IBC05)
 -)
 - UN1476 UN IBC05)
 -)
 - UN1481 UN PGI IBC04 PGII 05)
 -)
 - UN1483 UN IBC05)
 -)
 - UN1490 UN IBC05)
 -)
 - UN1503 UN IBC05)
 -)
 - UN1509 UN IBC05)
 -)
 - UN1515 UN IBC05)
 -)
 - UN1516 UN IBC05)
- The UK does not agree that these substances should be moved to IBC04A. Most are currently permitted in flexible IBCs in the IMDG Code
