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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Fifteenth session,
Geneva, 29 June-10 July 1998,
agenda item 3 (a))

PACKAGINGS AND IBCS

Packing instructions

Transmitted by the Expert from Belgium

BACKGROUND

1. Packing Instructions are being developed for inclusion in the UN-Recommendations during this biennium.
2. Discussions on this item prove to be very difficult and it is foreseeable that no consensus will be reached.
3. In the Ottawa working group two ways forward were presented for the introduction of Packing Instructions in the UN-Recommendations in such a case :

Solution 1 : introduce very liberal Packing Instructions (in general, the least stringent of the ones in existence in the different modes at this time) and authorise the modes to have more severe Packing Instructions where they deem it necessary.

Solution 2 : introduce the most stringent Packing Instructions in existence in the different modes (with the exception of the air mode) and thus keep the existing principle underlying the regulation of the transport of dangerous goods : less stringent requirements can be applied to a certain mode – for air transport only, more stringent requirements may occasionally apply (§ 5 of the UN-Recommendations).

The working group did not have a mandate to decide which way forward should be used. It is clear, however, that this point of principle has to be decided upon first. For evident reasons, this decision will have a decisive influence on the content of the Packing Instructions themselves.

4. It needs to be pointed out that, with solution 1, the use of a packaging according to the UN-Recommendations would give no guarantee whatsoever that it would be accepted worldwide, or even only by a certain mode, in all circumstances.
In other words, the Packing Instructions of the UN-Recommendations would be of very little or even no practical use.
Moreover, the UN-Recommendations would no longer take account of the most severe transport conditions and - as a consequence - lose their multimodal character.
With solution 2, the Packing Instructions of the UN-Recommendations would lead to multimodal packagings, where users would have the guarantee that these packagings are generally accepted (air mode excluded) and no difficulties or restrictions would emerge during transport.
5. In this respect, it also needs to be pointed out that the multimodal tank containers follow the underlying principles of solution 2 without any compromise. Belgium fails to see the need or even the benefit of a drastically different approach for the Packing Instructions.
6. Voting should be avoided as much as possible and – in any case – be limited. A vote on every Packing Instruction could lead to Instructions that satisfy nobody, with – as a possible result – that not a single mode will follow the Packing Instructions of the UN-Recommendations.

PROPOSAL

The Expert from Belgium proposes that the well-established principles underlying the UN-Recommendations given in paragraph 5 of the “Nature, Purpose and Significance of the Recommendations” should not be changed, and that the Packing Instructions put into the UN-Recommendations reflect the most stringent Packing Instructions in existence in the different modes (with the exception of the air mode).
