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**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****Forty-third session**

Geneva, 24–28 June 2013

Item 3 (c) of the provisional agenda

**Listing, classification and packing: miscellaneous****Packagings for aerosols****Transmitted by the expert from Germany<sup>1</sup>****Introduction**

1 With the seventeenth edition of the United Nations Model Regulations, P207 was introduced. The proposal of the European Aerosol Federation (FEA) (see ST/SG/AC.10/C3/2010/21) was aimed at closing the gap between the packagings permitted under packing provision P003 and packing provision LP02 for aerosols of UN 1950. There was no intention to tighten the requirements of packing provision P003 applicable at that time.

2 The wording of P207 stipulates that packagings shall be designed and constructed to prevent movement of the aerosols and inadvertent discharge while the previously applicable P003 only stipulates that inadvertent discharge of articles shall be prevented. This tightening of the provision results in some of the previously used packagings no longer being permitted for use, as they do not rule out movement of the aerosol. There are two variants of packagings that meet this stipulated requirement: They are either form-locking so that the aerosols can or have to be fitted tightly into the packaging, or they are force-locking so that the packagings secure the aerosols and thus lock them in the intended position.

3 The requirement that packagings shall be designed to prevent movement of the aerosols within the packagings does not make sense for waste aerosols, because special

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

provision 327 lays down that an inadvertent discharge of the aerosols is expressly allowed under certain conditions.

4 The tried and tested requirement in packing provision P003 that inadvertent discharge of articles be prevented includes the requirement that aerosols cannot move excessively within the packaging, as inadvertent discharge cannot be prevented otherwise. Thus, P207 should be amended accordingly.

5 This requirement to protect aerosols from inadvertent discharge should also be included in packing provision LP02. The reason for this is that it does not make sense to stipulate this for "small" packagings while permitting inadvertent discharge for large packagings.

6 Packing provision LP02 permits the transport of aerosols in flexible large packagings if these are used together with flexible inner packagings. Flexible packagings are not suitable for the safe transport of articles such as aerosols. In particular in the case of aerosols, it is not possible to ensure in flexible packagings that the protective caps remain safely in place and that there is adequate protection against inadvertent discharge. A prohibition of the use of flexible packagings for the transport of aerosols should be inserted in special packing provision L2 of LP02.

## Proposals

7. In P207, amend the last sentence before the special packing provisions to read:

“The packagings shall be designed and constructed to prevent inadvertent discharge during normal conditions of transport.”.

8. In LP02, amend special packing provision L2 to read:

“L2 For UN 1950 aerosols the large packaging shall meet the packing group III performance level. The large packagings shall be designed and constructed to prevent inadvertent discharge during normal conditions of transport. Flexible large packagings are not allowed. Large packagings for waste aerosols carried in accordance with special provision 327 shall have in addition a means of retaining any free liquid that might escape during transport e.g. absorbent material.”.

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