



**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

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Item 5 (g) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: Packagings**

**Conditions for assembling different types of inner packagings
in an outer packaging for type “V” packagings**

Submitted by the expert from France¹

Introduction

1. In accordance with 6.1.2.4, a packaging code may be followed by the letter “V” when the packaging meets the requirements set out in 6.1.5.1.7: this means that articles or inner packagings of any type can be assembled and carried without testing in an outer packaging, provided they meet the conditions set out in 6.1.5.1.7. One of those conditions is that the total combined gross mass of inner packagings shall not exceed one half the gross mass of inner packagings used for the drop test. However, there is no condition regarding the number or size of authorized packagings.
2. Recently, a package approved by a French body was not accepted for transport by air. One of the reasons cited by the inspector was that the package, type “4GV”, contained inner packagings that were larger than the packagings used for the drop test. The conditions set out in Chapter 6.1.5.1.7 had all been met, however, including the condition regarding the total combined gross mass of inner packagings, which was well below one half of the gross mass of inner packagings used for the drop test.
3. In fact, there was a misunderstanding: 6.1.5.1.6, which refers to 4.1.1.5.1, authorizes the use without further testing of an existing packaging code with inner packagings of

¹ 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).

smaller size than the tested inner packagings (4.1.1.5.1.a) or with a lesser number of inner packagings than the number of tested packagings (4.1.1.5.1.b), if the other conditions set out in 4.1.1.5.1 are met.

4. After some discussion, it has been established that the provisions of 4.1.1.5.1 regarding authorized changes to inner packagings (for a given type of packaging, without further testing) do not apply to the packagings referred to in 6.1.5.1.7 (special packagings with codes followed by the letter “V”). The source of this confusion was the transfer of the contents of 6.1.5.1.6 to paragraph 4.1.1.5.1.

5. So as to clarify the situation, it would be prudent to add a note to 4.1.1.5.1 specifying that the conditions set out do not apply to the packagings referred to in 6.1.5.1.7.

Proposal

6. At the end of paragraph 4.1.1.5.1 add a note as follows:

“NOTE: The provisions of this paragraph do not apply to the packagings referred to in 6.1.5.1.7.”
