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# COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the Transport of Dangerous Goods (Thirteenth session, Geneva, 7-17 July 1997, agenda item (3 (d))

## DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

#### Other draft amendments

#### Proposal to amend Chapter 15

# Transmitted by the European Confederation of Paint, Printing ink and Artist's Colours Manufacturers's Association (CEPE)

Proposal to amend Chapter 15 - Special Recommendations for Dangerous Goods in Limited Quantities, Paragraph 15.3 Packaging.

- Insert introductory text for paragraph 15.3 as follows:-
  - "15.3 Packaging

Dangerous goods in limited quantities transported according to these special recommendations shall be packaged as follows:-"

- 2. Insert a new paragraph 15.3.1 as follows:-
  - "15.3.1 In suitable packagings meeting the requirements of Chapter 9; or"

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- 3. Renumber existing paragraph 15.3.1 to 15.3.2 and delete the first line "Dangerous goods transported according to these special recommendations should be transported only".
- 4. Renumber existing paragraph 15.3.2 to 15.3.3.

#### Justification

Limited quantity packagings are by nature small size receptacles. There are various requirements concerning the information that has to be provided on these packagings, such as:-

- Health and Safety for Supply Regulatory information
- Transport Regulatory information
- · Instructions for use
- Commercial information

The IMDG Code, and also in Europe the ADR Regulations, restricts Limited Quantities to being transported as inner receptacles placed in suitable outer packagings, or in shrink-wrapped or stretch-wrapped trays. If industry wishes to use packagings conforming to Chapter 9 and to avail itself of the derogations available in Chapter 15 of these recommendations, and in particular paragraphs 15.5 and 15.7, such packagings would have to be placed in outer packagings or shrink-wrapped or stretch-wrapped trays. As packagings conforming to Chapter 9 are performance tested, such requirements are anomalous and an unnecessary use of resources which Regulatory bodies are endeavouring to avoid. This proposal seeks to correct this and permit industry to make the most efficient use possible of the available space on small packagings.