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**Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods**
(Geneva, 13-17 September 2004)

CHAPTER 3.4 – LIMITED QUANTITIES

**Transmitted by the International Association of the Soap, Detergent
and Maintenance Products Industry (AISE) */**

Proposal to amend the package sizes for UN 1791

Analytical Summary:	This proposal aims to amend the pack size allocated to UN1791 PG III to 5L and thereby harmonize it with the UN Model Regulations and the IMDG Code, save on packaging waste and remove problems in intermodal transport.
Action to be taken:	Amend the allocated LQ code for UN1791 PG III from LQ19 to LQ7.

1. Introduction

When RID, ADR and the IMDG Code were restructured, the pack sizes for Limited Quantities were generally left unchanged. This meant that a number of anomalies remained

*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT/III/2004/6.

between RID/ADR and the IMDG Code. Some of these have since been amended – for example, the IMDG pack size for UN1210 Printing Ink and UN1263 Paint of Packing Group II, amongst others, has been increased to 5L, aligning with RID/ADR.

The anomalous position on the pack sizes for UN3082 was recognized when the Joint Meeting agreed to harmonize its LQ size at 5L with effect from 2005 (TRANS/WP.15/AC.1/2003/10).

Recent changes to the test methods relating to the classification of corrosive materials and the introduction of the “pitting” test mean that many more hypochlorite products at a 4%-5% concentration (this is household bleach) will become liable to classification as UN1791 Class 8 PG III, having previously been non-hazardous for transport.

This has highlighted another anomaly between IMDG and RID/ADR. Traditionally, these products are packed in plastic bottles in sizes up to 5L and for convenience of handling are transported in cartons. The change of classification will make no material difference to their packaging for transport by sea, other than the marking with UN1791 in a diamond to meet the Limited Quantities provisions. However, it will lead to major difficulties for land transport as pack sizes will have to be reduced to 3L, adding to packaging waste when there is a universal drive across all modes to protect the environment. There is no evidence that the risk is any higher on land than at sea. It is suggested, therefore, that increasing the pack size to 5L would not be detrimental to safety, but would save on packaging waste and facilitate intermodal transport.

2. Proposal

Amend the LQ Code for UN1791 Packing Group III from LQ19 to LQ7.

3. Justification

Harmonization between RID/ADR and the IMDG Code without detriment to safety and a saving on packaging waste.
