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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

Twenty-sixth session, 29 November-3 December 2004
Item 2 of the provisional agenda

TEXT ADOPTED BY THE SUB-COMMITTEE AT ITS TWENTY-THIRD, TWENTY-FOURTH AND
TWENTY-FIFTH SESSIONS AND RELATED PROPOSALS

Infectious substances

P650

Transmitted by the expert from the Netherlands

Background

1. At the twenty-fifth session of the Sub-Committee, a number of amendments were made to packing instruction P650 (page 8 of the report ST/SG/AC.10/C.3/50/Add.1 and original document ST/SG/AC.10/C.3/2004/73). One of the changes was the requirement that the outer packaging shall be rigid.

2. The rationale behind this amendment is the fact that a rigid outer packaging provides a higher level of protection. This formulation is restrictive as the same level of safety can be achieved when requiring any packaging component beside the primary receptacle to be rigid.

Proposal

Rewrite P650 (2) to read:

- "(2) The packaging **shall** consist of **at least** three components (**packagings**):
- (a) a primary receptacle;
 - (b) a secondary packaging; and
 - (c) an outer packaging
- of which at least one component beside the primary receptacle shall be rigid."**

Justification

Packaging experts in the Netherlands agree that it is not necessary to require the *outer* packaging to be rigid, because the goal of protecting the primary receptacle against mechanical impact can also be reached when a packaging component beside the primary receptacle is rigid. In our view, the formulation of the new P650 is unnecessarily restrictive for industry. The proposal as presented above will provide an equal level of safety as the current P650 requirement, but it will also give more development opportunities for the packaging industry, especially as some companies already have developed packagings in conformity with the existing P650.
