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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-seventh session, 4-8 July 2005
Item 5 of the provisional agenda

LIMITED QUANTITIES

Limited quantity packaging
Testing requirements

Transmitted by the expert from Australia

SCOPE

This proposal aims at recommending amendments to section 3.4.2 of the UN Model Regulations on the Transport of Dangerous Goods.

Introduction

1. Australia is moving to adopt limited quantity provisions based on those contained in the UN Model Regulations within its domestic road and rail dangerous goods regulations. The limited quantity requirements of the IMDG Code are already applied in respect of domestic interstate sea transport and international sea transport. While the UN limited quantity principles are generally accepted concern has been expressed by industry and regulators that the adoption of the limited quantity provisions as contained in the UN Model Regulations represents a reduction in the requirements for packaging on the basis that testing is not required.

Issue

2. Section 3.4.2 requires packagings used for limited quantities to comply with the general construction requirements of section 6.1.4 but not the testing and marking requirements contained within 6.1.5 and 6.1.3 respectively. The reference to section 6.1.4 and to 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 effectively means the packagings employed should be constructed to a

standard that would allow them to pass the tests prescribed in section 6.1.5 but the mechanism to confirm that the packaging complies has not been adopted.

3. The Australian industry is supportive of the view that testing for limited quantity packages should be included as it adds little additional cost (being limited to the cost of testing as the package **should** comply with the construction requirements) but provides a greater certainty in so far as the adequacy of the package is concerned. It is recognised that this change cannot be applied to shrink-wrapped trays but it is considered that these are adequately covered by section 3.4.3.

Proposal

4. It is recommended that section 3.4.2 be modified to read:

“Dangerous goods shall be packed only in inner packagings placed in suitable outer packagings. However, the use of inner packagings is not necessary for the transport of articles such as aerosols or “receptacles, small, containing gas”. The packagings shall meet the provisions of 4.1.1.1 to 4.1.1.8, be so designed that they meet the construction requirements of 6.1.4 and, outer packagings be tested to the requirements of 6.1.5. The total gross mass of the package shall not exceed 30 kg.”
