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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

Thirty-fifth session
Geneva, 22–26 June 2009
Item 5 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL
REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS**

Permitted packaging types in Packing Instructions

Transmitted by the International Air Transport Association¹

Background

1. Almost all of the packing instructions contained in the Model Regulations start with the following statement: “The following packagings are authorized, ...”. In most cases the packing instruction then contains a list of the authorized inner, outer, single packagings, as applicable.
2. However, there are a number of packing instructions where no packaging types are shown, despite the packing instruction having the indicated statement. The absence of any listed packagings begs the question as to exactly which packagings are permitted.

¹ In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118(d) and ST/SG/AC.10/36, para. 14).

3. The packing instructions for which no specific packagings are listed are P004, P901, P902, P903. These packing instructions all apply to articles for which it is believed that the packagings required should be outer packagings as required for combination packagings.

4. However when looking at the definition for “outer packaging” and indeed for “combination packaging” it appears that the terminology used is not consistent with packagings for articles and therefore it’s proposed that there should be some minor amendment to the wording of those definitions to make provision for packaging of articles.

Proposal

5. Amend the definitions of “combination packaging” and “outer packaging” as follows (new text underlined):

Outer packaging means the outer protection of a composite or combination packaging together with any absorbent materials, cushioning and any other components necessary to contain and protect inner receptacles, ~~or~~ inner packagings or articles;

Combination packaging means a ~~combination of packagings~~ packaging ~~for transport purposes~~, consisting of one or more inner packagings or articles secured in an outer packaging in accordance with 4.1.1.5;

6. Amend the applicable packing instructions as follows (new text underlined):

P004	PACKING INSTRUCTION	P004
This instruction applies to UN Nos. 3473, 3476, 3477, 3478 and 3479		
The following packagings are authorized provided the general provisions of 4.1.1.1 , 4.1.1.2 , 4.1.1.3 , 4.1.1.6 and 4.1.3 are met:		
(1)	For fuel cell cartridges, <u>outer packagings according to P002</u> conforming to the packing group II performance level; and	
(2)	For fuel cell cartridges contained in equipment or packed with equipment, strong outer packagings. Large robust equipment (see 4.1.3.8) containing fuel cell cartridges may be carried unpackaged. When fuel cell cartridges are packed with equipment, they shall be packed in inner packagings or placed in the outer packaging with cushioning material or divider(s) so that the fuel cell cartridges are protected against damage that may be caused by the movement or placement of the contents within the outer packaging. Fuel cell cartridges which are installed in equipment shall be protected against short circuit and the entire system shall be protected against inadvertent operation.	

P901	PACKING INSTRUCTION	P901
This instruction applies to UN 3316		
The following packagings are authorized provided the general provisions of 4.1.1 and 4.1.3 are met: Packagings <u>Outer packagings according to P002</u> conforming to the performance level consistent with the packing group assigned to the kit as a whole (see 3.3.1, special provision 251). Maximum quantity of dangerous goods per outer packaging: 10 kg.		
Additional requirement: Dangerous goods in kits shall be packed in inner packagings which shall not exceed either 250 ml or 250 g and shall be protected from other materials in the kit.		

P902	PACKING INSTRUCTION	P902
This instruction applies to UN 3268		
The following packagings are authorized provided the general provisions of 4.1.1 and 4.1.3 are met: Packagings <u>Outer packagings according to P002</u> conforming to the packing group III performance level. The packagings shall be designed and constructed to prevent movement of the articles and inadvertent operation during normal conditions of carriage. The articles may also be carried unpackaged in dedicated handling devices, vehicles or containers when moved from where they are manufactured to an assembly plant.		
Additional requirement: Any pressure vessel shall be in accordance with the requirements of the competent authority for the substance(s) contained in the pressure vessel(s).		

P903	PACKING INSTRUCTION	P903
This instruction applies to UN Nos. 3090, 3091, 3480, and 3481		
The following packagings are authorized provided the general provisions of 4.1.1 and 4.1.3 are met: Packagings <u>Outer packagings according to P002</u> conforming to the packing group II performance level When cells and batteries are packed with equipment, they shall be packed in inner fibreboard packagings that meet the requirements for packing group II. When cells and batteries included in Class 9 are contained in equipment, the equipment shall be packed in strong outer packagings in such a manner as to prevent accidental operation during carriage. In addition, batteries with a strong, impact resistant outer casing of a gross mass of 12 kg or more, and assemblies of such batteries, may be packed in strong outer packagings, in protective enclosures (e.g., in fully enclosed or wooden slatted crates) unpackaged or on pallets. Batteries shall be secured to prevent inadvertent movement, and the terminals shall not support the weight of other superimposed elements.		
Additional requirement: Batteries shall be protected against short circuit.		