



**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-seventh session**

Geneva, 21-30 June 2010

Item 3 of the provisional agenda

Listing, classification and packing**Packaging for aerosols****Transmitted by the European Aerosol Federation (FEA)¹****Introduction**

1. Following the adoption of Packing Instruction LP02 for UN 1950 AEROSOLS there is a gap in the range of packagings permitted for use in the different transport modes. P003 limits in PP17 the total net mass of aerosols in packagings to 55kg (fibreboard) and 125kg (other materials), whilst LP02 begins with packagings of at least 450L volume or 400kg capacity.
2. In air transport packagings with flammable or non-flammable aerosols are limited to 75kg (passenger aircraft) and 150kg (cargo aircraft) according to Packing Instruction 203 with the use of design type approved packages.
3. There is more and more demand from retailers that as far as possible packages are dispatched from the manufacturer in “ready for sale” display units and larger boxes of aerosols which can be sent straight to the shop floor are being used. Such boxes are unlikely to generally fall with the provisions for large packagings, or P003. Packagings exceeding the limits in P003 can only be transported on the basis of exemptions issued by competent authorities, which may not always be possible.

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 (a) and ST/SG/AC.10/36, para. 14).

4. At the thirty-sixth session of the Sub-Committee, FEA submitted an informal document INF.26 proposing to close the gap in allowing the use of larger combination packagings, if the shipper uses design type approved packages. The Sub-Committee invited FEA to submit a formal proposal at the next session.

5. The FEA took into account the comments received and offers two solutions to the problem.

Proposal 1

6. Delete UN 1950 from PP17 in P003 (the consequential change would be to delete PP17 from Column 9 for the UN 1950 entry in the dangerous good list).

Justification

(a) The remaining link between UN 1950 and UN 2037 is PP17 and is based on the fact that some years ago SP63 was applicable to both aerosols and receptacles small containing gases. However, with the publication of the 12th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations SP63 now only applies to aerosols (UN 2037 has a new SP303).

(b) The current restrictions in PP17 are less generous than what is permitted by ICAO and date from the packing instruction exercise for the 11th revised edition of the Recommendations when packaging limits were adopted because both the IMDG Code and RID/ADR had similar but different provisions:

	<i>ADR 1999</i>	<i>IMDG Code 1999</i>
Wooden	75kg	125kg
Fibreboard	50kg	55kg

It is far from clear where these figures originated but it is likely that they were adopted in the late 1960s or early 1970s when there was no criteria for the manufacture and construction of aerosols.

(c) The text for the testing and classification of aerosols has been completely revised during the GHS processes and there is now a universal set of criteria for both the can performance and the contents. These provisions have been implemented into all the modal regulations for nearly 6 years

(d) Packages allocated to this packing instruction get relaxations from the need for UN approved packaging but are not exempt from the need for hazard communication (marks, labels and documents).

Proposal 2

7. If the sub committee cannot accept Proposal 1, then FEA propose a new packing instruction for aerosols as follows:

P2yz	PACKING INSTRUCTION	P2yz
This instruction applies to UN 1950.		
<p>The following packagings are authorized, provided that the general provisions of 4.1.1 and 4.1.3, are met:</p> <p>(a) For packagings not exceeding the following conditions: Fibreboard 55kg net mass Metal, plastics or wood 125kg net mass</p> <p>The provisions of 4.1.1.3 need not be met</p> <p>(b) For packagings exceeding the mass above Drums (1A2, 1B2, 1N2, 1H2, 1D, 1G); Boxes (4A, 4B, 4C1, 4C2, 4D, 4F, 4G, 4H1 4H2)</p> <p>Packagings shall conform to the packing group II performance level</p> <p>Special packing provisions:</p> <p>PP87 For UN 1950 waste aerosols carried in accordance with special provision 327, the packagings shall have a means of retaining any free liquid that might escape during carriage, e.g. absorbent material. The packaging shall be adequately ventilated to prevent the creation of flammable atmosphere and the build-up of pressure.</p>		

8. As a consequence, amend existing Packing Instruction P003 (deleted text is stricken out):

P003	PACKING INSTRUCTION	P003
<p>Dangerous goods shall be placed in suitable outer packagings. The packagings shall meet the provisions of 4.1.1.1, 4.1.1.2, 4.1.1.4, 4.1.1.8 and 4.1.3 and be so designed that they meet the construction requirements of 6.1.4. Outer packagings constructed of suitable material of adequate strength and designed in relation to the packaging capacity and its intended use shall be used. Where this packing instruction is used for the transport of articles or inner packagings of combination packagings the packaging shall be designed and constructed to prevent inadvertent discharge of articles during normal conditions of transport.</p> <p>Special packing provisions:</p> <p>PP16 For UN 2800, batteries shall be protected from short circuit within the packagings.</p> <p>PP17 For UN No.s. 1950 and 2037, packages shall not exceed 55 kg net mass for fibreboard packagings or 125 kg net mass for other packagings.</p>		

P003	PACKING INSTRUCTION	P003
PP18	For UN 1845, packagings shall be designed and constructed to permit the release of carbon dioxide gas to prevent a build-up of pressure that could rupture the packagings.	
PP19	For UN Nos. 1327, 1364, 1365, 1856 and 3360 transport as bales is authorized.	
PP20	For UN Nos. 1363, 1386, 1408 and 2793 any siftproof, tearproof receptacle may be used.	
PP32	UN Nos. 2857 and 3358 may be transported unpackaged, in crates or in appropriate overpacks.	
PP87	For UN 1950 waste aerosols transported in accordance with special provision 327, the packagings shall have a means of retaining any free liquid that might escape during transport e.g. absorbent material. The packaging shall be adequately ventilated to prevent the creation of flammable atmosphere and the build-up of pressure.	

Replace P003 by P2yz in Column 8 of the UN1950 entry in the dangerous goods list.