



DANGEROUS GOODS PANEL (DGP)

TWENTY-FOURTH MEETING

Montréal, 28 October to 8 November 2013

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2015-2016 Edition

REQUIREMENTS FOR EXCEPTED QUANTITIES: EXCEPTED QUANTITY PROVISIONS REGARDING THE USE OF ABSORBENT AND CUSHIONING MATERIAL

(Presented by CEFIC)

SUMMARY

This proposal contains alternative methods of packing using absorbent material.

Action by the DGP: The DGP is invited to amending Part 3;5.2.1 as shown in the appendix of this working paper.

1. INTRODUCTION

1.1 Using the excepted quantity provisions for some products, especially sold to physicians, dentists or consumers, a problem regarding the placement of the absorbent material has been detected. CEFIC wants to stress that relaxation of the provisions is not the aim, but more flexibility to achieve the same level of safety for the packaging. Therefore alternative methods are proposed to assure that no liquid can escape the packaging, if an inner package breaks during transport.

1.2 Today the cushioning material and the absorbent material needs to be placed into the intermediate packaging according to Part 3;5.2.1 b). Instead of placing the absorbent material into the intermediate packaging CEFIC looks for a possibility to place it into the outer packaging instead, because the intermediate package is the package which many end-users like dentists or physicians receive with a wide variety of products, shipped as excepted quantities. These customers do not want to receive the absorbent material in the packaging which they will eventually use for storage purpose. For environmental reasons CEFIC is reluctant to add additional package levels, if this is not needed to maintain the safety level of the packaging.

1.3 Therefore several issues are raised in this paper, which are proposed to be amended. The alternative methods are based on the following considerations:

- a) Cushioning material is needed for solids and liquids, but absorbent material is only required for liquids. Therefore the provisions need to be separated.
- b) Different alternatives for the placement of the absorbent material should be presented and may be accepted, so that the appropriate one can be chosen.
- c) The additional solution needs to be suitable for inner packages in all orientations in the packaging.

1.4 All of the above-mentioned options fulfil the requirement that in case of a leakage or breaking of the inner packages the complete content of the inner packages are contained inside the package and cannot escape into the environment. Some of the options in addition give the possibility to achieve this aim without adding package levels, which is prohibited in some countries (eg. Germany) based on environmental regulations.

APPENDIX

PROPOSED AMENDMENT TO PART 3 OF THE TECHNICAL INSTRUCTIONS

Part 3

DANGEROUS GOODS LIST,
SPECIAL PROVISIONS AND
LIMITED AND EXCEPTED QUANTITIES

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Chapter 5

DANGEROUS GOODS PACKED IN EXCEPTED QUANTITIES

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5.2 PACKAGINGS

5.2.1 Packagings used for the transport of dangerous goods in excepted quantities must be in compliance with the following:

- a) there must be an inner packaging and each inner packaging must be constructed of plastic (when used for liquid dangerous goods it must have a thickness of not less than 0.2 mm), or of glass, porcelain, stoneware, earthenware or metal (see also 4;1.1.3.1) and the closure of each inner packaging must be held securely in place with wire, tape or other positive means; any receptacle having a neck with moulded screw threads must have a leak proof threaded type cap. The closure must be resistant to the contents;

- b) each inner packaging must be securely packed in an intermediate packaging ~~with cushioning material~~ in such a way that, under normal conditions of transport, they cannot break, be punctured or leak their contents. This can be achieved using cushioning material or appropriate packagings (like kit packages). ~~The intermediate packaging must completely contain the contents.~~ In case of breakage or leakage, regardless of package orientation, the content needs to be completely retained inside the packaging. For liquid dangerous goods, several options are available to achieve this:

- 1) the intermediate packaging must contain sufficient absorbent material to absorb the entire contents of the inner packaging. In such cases, the absorbent material may be the cushioning material; or
- 2) the absorbent material may be placed in the outer packaging if it is guaranteed that the content is completely retained in the outer package no matter which orientation the package has; or
- 3) if the combination of inner packaging and intermediate package can withstand an additional drop test following the same procedure as prescribed in 5.3 for the whole package, cushioning material and/or absorbent material may be placed in the outer package instead of in the intermediate package; or
- 4) the intermediate packages are placed inside a closed liner, which contains enough absorbent material to absorb the complete content of all inner packages. In this case the orientation of the package can be neglected and no additional drop test is required.

Dangerous goods must not react dangerously with cushioning, absorbent material and packaging material or reduce the integrity or function of the materials;

- c) the intermediate packaging must be securely packed in a strong, rigid outer packaging (wooden, fibreboard or other equally strong material);
- d) each package type must be in compliance with the provisions in 5.3;
- e) each package must be of such a size that there is adequate space to apply all necessary markings; and
- f) overpacks may be used and may also contain packages of dangerous goods or goods not subject to these Instructions provided that the packages are secured within the overpack.

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