

DANGEROUS GOODS PANEL

Dubai, 31 March to 4 April 2003

Agenda Item 2: Development of recommendations for amendments to the Technical Instructions for incorporation in the 2005/2006 edition

PACKING INSTRUCTION 650

(Presented by P Steele)

1. INTRODUCTION

1.1 In the 2003-2004 Technical Instructions Packing Instruction 650 does not include the requirement of the previous Instructions that "The general packing requirements of Part 4, Chapter 1 must be met." Because PI650 no longer mandates compliance with the general packing requirements, there is no indication to the shipper that they must comply with:

- C The quality of used packagings.
- C Ullage requirements.
- C Orientation requirements.
- C Embrittlement concerns with refrigerants etc.
- C Limitations on transport in salvage packagings.
- C Empty packaging requirements.
- C Consideration for solids that may become liquid at temperatures encountered in transport.

Without a specific reference to the general packing requirements, shippers may be unaware of the conditions to which their consignments are likely to be exposed, and shippers and regulators have no promulgated standards to which they can refer.

1.2 In addition, PI650 contains different requirements for the packaging of liquids and solids. Our Inspectors have received many requests from industry to define what is a liquid and what is a solid, and have been asked to arbitrate where differences of interpretation have arisen. For example, a shipper may state that, when frozen, a liver is a solid, and therefore solid packaging requirements apply; others believe, because the liver contains fluid, that packaging for liquids should apply. A definition within the Instructions, or a definition published elsewhere and recognized by the Panel, would in our view be beneficial for all.

2. **PROPOSAL**

2.1 The Panel is invited to consider if it was intended to remove all reference to the general packing requirements in PI650. If it was not intended, PI650 should be amended to include reference to the general packing requirements. If the intention is that only some of the requirements should apply, reference to those requirements should be listed in PI650.

2.2 Panel members are asked if they know of published definitions that would be useful in relation to diagnostics.

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