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**COMMITTEE OF EXPERTS ON THE  
TRANSPORT OF DANGEROUS GOODS**

**Sub-Committee of Experts on the  
Transport of Dangerous Goods**  
(Fifteenth session,  
Geneva, 29 June-10 July 1998,  
agenda item 3 (a))

**PACKAGINGS AND IBCS**

**Packing instructions and special provisions**

**Transmitted by the Expert from Belgium**

**Introduction**

1. During the December meeting of the Sub-Committee of Experts on the Transport of Dangerous Goods, the presentation of the packing instructions and their relation to the dangerous goods list in Chapter 3.2 - as presented in document ST/SG/AC.10/C.3/1997/52 - was not addressed (paragraph 26 of the draft report). However, Belgium is of the opinion that these aspects need to be discussed, because a decrease in the number of packing instructions to the absolute minimum and the incorporation of all relevant special provisions in the packing instructions themselves (as Particular Packing Provisions or Exceptions) is not user-friendly.
2. With the packing instructions as proposed in ST/SG/AC.10/C.3/1997/52, the user will have to undertake the following steps :
  - find the number of the packing instruction to be used in column 8 of the dangerous goods list (starting from the appropriate UN-number),
  - go to this packing instruction in sub-section 4.1.3,
  - take note of the packagings that are allowed,

- check every Particular Packing Provision or Exception, to see whether it applies to his UN number.

The last step will be very unpleasant for the user. In P002 for instance, he will always have to make eight checks which will nearly always be negative.

### **Proposal**

1. Belgium proposes to eliminate the Particular Packing Provisions or Exceptions, and to replace each one of them with a new Packing Instruction. Less than 20 new Packing Instructions would be needed. In this way, the last step for the user would be completely eliminated.
  2. If this proposal is not accepted, Belgium proposes to return to the previous situation : eliminate the Particular Packing Provisions or Exceptions, and transform them into Special Provisions, with a reference to them in column 9 of the Dangerous Goods List. As a result of this, the user will - in the vast majority of cases - immediately know that he only has to consult the Packing Instruction indicated in column 8. In some cases he has to go to chapter 3.3 as well as to sub-section 4.1.3 ; however, these cases are very few and are immediately and clearly identified.
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