

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

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Item 3 of the provisional agenda

Listing, classification and packing

Comments to informal document INF.13 by the Republic of Korea on adding special packing provisions of P200 to the dangerous goods list

Submitted by the European Industrial Gases Association (EIGA)

Introduction

1. EIGA is not in favour of the changes proposed by the Republic of Korea.
2. By adding lower case letters or the reference “see P200”, further complexity is added to the table. This distinction would be required due to the fact that there are entries to the table in P200 under one UN number with multiple lines.
3. 4.1.3.1 specifies the logic for naming the special packing provisions. The proposal of the Republic of Korea does not follow this logic.
4. EIGA’s understanding is that the table in P200 was purposefully added to list special packing provision and also other details on Class 2 dangerous goods to reduce the complexity of the dangerous goods list in 3.2.
5. Furthermore, there are many Class 2 dangerous goods that do not have any listed special packing provisions.
6. EIGA is not aware that the current logic of column 9 of the dangerous goods list in Chapter 3.2 has caused misunderstandings or problems.

Proposal 1

7. Keep column (9) of the dangerous goods list of 3.2 as is without changes.
8. This is what EIGA prefers.

Proposal 2

9. If there is an agreement that changes are required, EIGA proposes to only add “see P200” for those Class 2 dangerous goods that have entries under “special packing provisions” in the table in P200, see examples below (new text is underlined).
10. Refrain from using in the dangerous goods list of 3.2 the lower-case letters used for special packing provisions for Class 2 dangerous goods, listed in the table in P200.

UN No.	Name and description	Class or division	Subsidiary hazard	UN packing group	Special provisions	Limited and excepted quantities		Packagings and IBCs	
						(7a)	(7b)	Packing instruction	Special packing provisions
(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9)
1045	FLUORINE, COMPRESSED	2.3	5.1 8			0	E0	P200	<u>See P200</u>
1046	HELIUM, COMPRESSED	2.2			378 392	120 ml	E1	P200	