



**NOTA DE ESTUDIO**

**GRUPO DE EXPERTOS SOBRE MERCANCÍAS PELIGROSAS (DGP)**

**VIGESIMOTERCERA REUNIÓN**

**Montreal, 11 - 21 de octubre de 2011**

**Cuestión 2 del orden del día:** **Formulación de recomendaciones sobre las enmiendas de las *Instrucciones Técnicas para el transporte sin riesgos de mercancías peligrosas por vía aérea* (Doc 9284) que haya que incorporar en la edición de 2013-2014**

**FLECHAS DE POSICIÓN EN LOS EMBALAJES COMBINADOS QUE CONTIENEN EMBALAJES INTERIORES “HERMÉTICAMENTE SELLADOS”**

(Nota presentada por D. Brennan)

*Por la falta de recursos, sólo se han traducido el resumen y el apéndice*

**RESUMEN**

En esta nota de estudio se propone revisar el texto de la Parte 4;1.1.13 de las Instrucciones Técnicas en relación con los embalajes interiores “herméticamente sellados”.

**Medidas recomendadas al DGP:** Se invita al DGP a revisar la Parte 4;1.1.13 de las Instrucciones Técnicas conforme a lo que figura en el apéndice.

**1. INTRODUCTION**

1.1 During discussion of a proposal presented at the DGP Working Group of the Whole Meeting in Atlantic City (DGP-WG/11, 4 to 11 April 2011), concerns were raised at the exception from the application of orientation arrows on combination packagings where the inner packagings were “hermetically sealed” that was adopted into Part 4;1.1.13 of the Technical Instructions based on changes to the 16<sup>th</sup> revised edition of the UN Model Regulations (DGP/23-WP/3, paragraph 3.2.22 refers).

1.2 The proposal made at DGP-WG/11 was supported in principle, although there was concern that the term “hermetically sealed” was widely used in the UN Model Regulations, and therefore the Technical Instructions and any change would have to be carefully considered.

1.3 Based on comments received during DGP-WG/11 a paper was submitted to the 39<sup>th</sup> meeting of the UN Subcommittee raising the issue of the use of “hermetically sealed” in the exception from application of orientation arrows.

1.4 There was an amount of discussion at the Subcommittee meeting on the meaning of “hermetically sealed” and some acknowledgement that while the term is widely used in the Model Regulations, it does not appear to have a consistent meaning in all instances. The report of the 39<sup>th</sup> meeting reads “The general feeling was that this term meant an air and vapour tight sealed closure. It was noted that the term is used in a number of other places in the Model Regulations that might make a single definition difficult to achieve.”

1.5 Based on the requirements set out in the Technical Instructions all inner packagings containing liquid are expected to be securely sealed and to retain their contents throughout the transport process. This could clearly be seen by some shippers as the inner packagings being hermetically sealed.

1.6 Some existing provisions in the Technical Instructions may also reinforce that belief. For example in Packing Instructions 487 – 491 in the additional packing requirements for combination packagings for Packing Group I there is the requirement that “inner packagings must be hermetically sealed, e.g. by taping or by threaded closures.”. This language is not dissimilar to the requirement in Part 4;1.1.4.1 of the Technical Instructions for inner packagings containing liquids where one of the examples given for closures to be held in place by secondary means is “adhesive tape”.

1.7 For these reasons it is believed that simply referring to “hermetically sealed” in the exceptions from application of orientation arrows in Part 4;1.1.13 could lead shippers to believe that any combination package containing inner packagings with not more than 500 mL does not require application of orientation arrows.

1.8 Looking back to the original proposal to the UN Subcommittee and the types of inner packagings it is believed that these inner packagings are those where the packaging must actually be pierced or punctured to allow for the release of the contents. Accordingly, rather than trying to limit application to flammable liquids and environmentally hazardous substances as was originally proposed in DGP-WG/11-WP/3, it is proposed instead to make reference to the inner packaging being of the type that must be punctured or pierced.

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## APÉNDICE

### ENMIENDA PROPUESTA DE LAS INSTRUCCIONES TÉCNICAS

#### Parte 4

### INSTRUCCIONES DE EMBALAJE

#### Capítulo 1

### CONDICIONES GENERALES RELATIVAS A LOS EMBALAJES

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#### 1.1 CONDICIONES GENERALES APLICABLES A TODAS LAS CLASES, CON EXCEPCIÓN DE LA CLASE 7

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1.1.13 Los embalajes combinados que contengan mercancías peligrosas líquidas, ~~excluyendo las inflamables en embalajes interiores de 120 mL o menos, o sustancias infecciosas en recipientes primarios de 50 mL como máximo, o embalajes interiores herméticamente sellados que contengan, cada uno, no más de 500 mL~~ deben embalarse de modo que los cierres de los embalajes interiores estén colocados hacia arriba y la posición vertical del bulto tiene que indicarse en éste, poniendo la etiqueta de posición del bulto descrita en 5;3.2.12 b). También es conveniente poner en la cubierta superior del bulto las palabras "parte superior" o "extremo superior".

1.1.13.1 Las condiciones de 1.1.13 no se aplican a los embalajes combinados que contienen:

- a) líquidos inflamables en embalajes interiores de 120 mL o menos;
- b) sustancias infecciosas en recipientes primarios que no exceden de 50 mL; y
- c) mercancías peligrosas en embalajes interiores sellados, como tubos, sacos o frascos que se abren quebrándolos o perforándolos y que una vez abiertos sólo pueden volver a sellarse con un cierre de alternativa o secundario. Cada embalaje interior no debe contener más de 500 mL.

— FIN —