

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**
(Twentieth session, 3-12 December 2001,
agenda item 5(b))

PACKAGINGS

Miscellaneous proposals

Revisions to 6.1.4.8, Plastics drums and jerricans

Transmitted by the Expert from the United Kingdom

Introduction

1. The expert from the United Kingdom draws the attention of the Sub-Committee to Part 6.1.4 of the Model Regulations which is entitled 'Requirements for Packagings'. This part provides specifications for the different types of packaging that can be approved under the test requirements for packagings in 6.1.5. 6.1.4.8 addresses plastics drums and jerricans. Paragraph 6.1.4.8.2 includes two subjects that are not directly related to the specification requirements for plastics drums and jerricans. Firstly, it states that the permitted period of use shall not exceed 5 years – a packaging user responsibility. Secondly, it provides for the allocation of a special supplementary mark when recycled plastics material is used i.e. REC – a marking duty. The full text is set out below:

6.1.4.8.2 Unless otherwise approved by the competent authority, the period of use permitted for the transport of dangerous substances is five years from the date of manufacture of the packaging except where a shorter period of use is prescribed because of the nature of the substance to be transported. Packagings manufactured with such recycled plastics material shall be marked "REC" near the marks prescribed in 6.1.3.1.

2. In land transport regulations in Europe this paragraph has been split up and moved as follows:

ADR text

4.1.1.15 For plastics drums and jerricans, rigid plastics IBCs and composite IBCs with plastics inner receptacles, unless otherwise approved by the competent authority, the period of use permitted for the transport of dangerous substances shall be five years from the date of manufacture of the receptacles, except where a shorter period of use is prescribed because of the nature of the substance to be transported.

6.1.3.6 Packagings manufactured with recycled plastics material as defined in 1.2.1 shall be marked "REC". This mark shall be placed near the mark prescribed in 6.1.3.1.

3. The United Kingdom believes that the editorial approach taken in RID/ADR is preferable to that of the Model Regulations as Chapter 4.1 addresses packaging user responsibilities and Chapter 6.1.3 deals with marking of packaging relating to testing. The expert from the United Kingdom suggests therefore similar amendments to the Model Regulations.

4. Proposal

(a) Add a new paragraph 4.1.1.15 as follows;

“4.1.1.15 For plastics drums and jerricans, rigid plastics IBCs and composite IBCs with plastics inner receptacles, unless otherwise approved by the competent authority, the period of use permitted for the carriage of dangerous substances shall be five years from the date of manufacture of the receptacles, except where a shorter period of use is prescribed because of the nature of the substance to be transported”

Renumber existing 4.1.1.15 and 4.1.1.16 as 4.1.1.16 and 4.1.1.17

(b) Introduce a new paragraph 6.1.3.6.1 between the first and second paragraphs of existing paragraph 6.1.3.6

“6.1.3.6.1 Packagings manufactured with recycled plastics material as defined in 1.2.1 shall be marked "REC". This mark shall be placed near the mark prescribed in 6.1.3.1.”

Number the second paragraph of 6.1.3.6 as 6.1.3.6.2

(c) Delete 6.1.4.8.2 and renumber the remaining paragraphs in 6.1.4.8.
