

# UN/SCETDG/22/INF.36

## 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  
(Twenty-second session, 2-6 December 2002,  
agenda item 4(a))

### NEW PROPOSALS

#### Outstanding issues

#### Repetitive Shock Test (ST/SG/AC.10/C.3/2002/77)

##### Transmitted by

International Confederation of Plastics Packaging Manufacturers (ICPP)  
International Association of the Soap, Detergent and Maintenance Products Industry (AISE)  
International Confederation of Container Reconditioners (ICCR)  
International Council of Intermediate Bulk Container Associations (ICIBCA)  
International Fibre Drum Institute (IFDI)

1. On the 21<sup>st</sup> session of the UN Sub-Committee the representatives of the concerned industrial associations criticised with INF.37 the proposed introduction of a vibration test as follows:

"Neither paper cites research, incident analysis or actual field performance to support the need for such a test. It is therefore unlikely that the proposed would lead to a higher safety level."

After detailed discussion on the July-session and after studying the proposal of the expert from USA (ST/SG/AC.10/C.3/2002/77), the representatives from the industry regret that again there were no proofs for the necessity to introduce a vibration test.

2. Regardless of the missing safety-related justification of the proposal the document -/2002/77 shows inconsistencies:
  - For packaging a capability test is planned, whereas a design type test is intended for IBCs and large packagings. Resulting from the discussion on the July meeting it was agreed that a capability test would be intended for packaging and IBCs (see UN/SCETDG/21/INF63, USA). For the industry there is no safety-related reason to treat IBCs and large packagings in a different way than packaging.
  - In the proposal of document -/2002/77, design types containing solids are treated in a different way: FIBCs and bags are excluded from a vibration test, other packagings are meant to undergo it. For the industry it is not clear why rigid packaging for solids and articles should be treated in a different kind than FIBCs or bags.
3. Moreover, the proposal in document 2002/77 does not follow the decision of the Sub-Committee meeting of December 1999 that if new test criteria are adopted, they should be based upon existing international standards. In this decision it is to read:

"Following a majority vote, the Sub-Committee decided that, in principle, at some time in the future, a vibration test should be included in the Model Regulations, on the understanding that the forms the test would take and the criteria for it were still to be defined and should take account of pertinent ISO standards and existing vibration test standards."

4. Due to the narrow decision at the July 2002 meeting of the Sub-Committee and the remaining problems with the current proposal, we believe that this issue should be addressed through a formal proposal offered during the next biennium.

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