

## 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-fourth session  
Geneva, 3-10 December 2003  
Item 4(b) of the provisional agenda

### PACKAGINGS (INCLUDING IBC'S AND LARGE PACKAGINGS)

Comments on ST/SG/AC.10/C.3/2003/44

Transmitted by the International Confederation of Drum Manufacturers (ICDM)  
on behalf of ICDM,

the International Association for Soaps, Detergents and Maintenance Products (AISE),  
the European Council of Paint, Printing Ink and Artists Colors Industry (CEPE),  
the International Council of Chemical Associations (ICCA),  
the International Confederation of Plastics Packaging Manufacturers (ICPP),  
and the International Fiber Drum Institute (IFDI)

1. With reference to the Sub-Committee Report of the 21st Session ST/SG/AC.10/C.3/42 (Clause 46) the Expert from Spain has failed to provide accident and/or incident data to justify introducing puncture testing. This is in conflict with the consensus of the Experts that before introducing new requirements perceived problems should be justified. (See Paragraphs 32 – 34 of Report of 23rd Session, ST/SG/AC.10/C.3/46 )
  2. The Expert is highlighting deficiencies in his country associated with manual handling. 'Protruding nails' are not part of 'normal conditions of handling' as all pallets are required to be inspected, to ensure they are free of protruding nails before being filled with packages.  
  
We do not believe that any puncture test can substitute for due diligence of the shipper and transporter to prepare and handle, etc, these packaging into a distribution system that is free of puncture hazards.
  3. With reference to paragraph 1 (a) and 1 (b), these are identifying conditions, which have not been established as causing problems during normal conditions of transport.
  4. We reiterate that conditions identified in paragraph 1 (c) and 1(d) should be addressed by supplying sufficient guidance on manual handling and storing , without resorting to the introduction of an unjustified puncture test which would have the affect of substantially increasing the material, i.e. tare mass of all packaging destined to contain dangerous liquids.
  5. We cannot understand the choice of a puncture test which causes failure in steel drums of 1.2mm thickness. Over the past 30 years millions of these drums( having passed the UN design type performance tests) have been used and reused for the transport of dangerous liquids safely. Furthermore it is not understood why the proposal is specifying a puncture test for all drums because they are sometimes loaded and transported on pallets, whereas containers(below 20 liters), which are invariably transported on pallets, are to be exempt.
  6. We consider that, before embarking on an expensive program of puncture testing, the above comments need to be addressed by Spain.
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