

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

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PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)

Evaluation of the United Nations packaging requirements

Transmitted by the expert from Germany

Introduction

1. Following the discussion of document ST/SG/AC.10/C.3/2003/10 by the United Kingdom during the July-meeting on the reference to ISO 16104, a revised proposal has been submitted by the United Kingdom (ST/ SG/AC.10/C.3/2003/37). Being adopted, references to this standard would be endorsed in various paragraphs of sections 6.1.5 and 4.1.1.
2. In view of three more very similar standard projects on testing procedures for packages for infectious substances (CEN WI 261305), IBC's (EN ISO 16467) and Large Packagings (ISO 16883) the agreement on the referencing to the packaging test standard will be the pattern to be followed. Similar changes in chapters 6.3. 6.5 and 6.6 are then to be expected.
3. Similar to the French proposal (UN/SCETDG/23/INF.21) discussed during the July-meeting, the United Kingdom approach would have the effect, that users (test houses) are obliged to cope simultaneously with legal provisions based on the UN model regulations and the standard. For this type of standards, having a big overlap of regulations with the UN model regulations this is seen as an unacceptable approach from the following reasons:
 - The aspect of user-friendliness, which was one of the objectives to incorporate text of the UN model regulations in the standard, is lost. Users are forced to keep track with the standard and legal provisions.
 - More serious are possible temporary inconsistencies between the legal provisions based on UN and the standard. Inconsistencies may occur because of the differences in working procedures and timetables applied by the rule-setting bodies and the standard organizations.
 - The adaptation of the standard to amended requirements in UN is a voluntary effort by the standards organizations and, therefore, in principle, subject to delays. In addition, revisions of the standard may need to be reviewed by the rule-setting bodies.
 - Finally, UN has already got an adequate platform to describe test procedures, the manual, which is set up and maintained on a self-standing basis.

4. A second source for a larger number of changes of chapters 6.1, 6.3, 6.5 and 6.6 is to assumed by the adoption of the proposal by the Netherlands to evaluate the United Nations packaging requirements (see Nos. 32 – 34 of the report **ST/SG/AC.10/C.3/46** and working paper ST/SG/AC.10/C.3/2003/57.

5. On this occasion a summarizing view on these chapters and the UN test manual is required. At this point of time it would be possible to agree on some major improvements in terms of streamlining and user-friendliness.

6. In order to keep the “regulatory” part of the United Nations model regulations limited, test procedures for the classification of substances have been excluded and put down separately in the United Nations test manual. There should be no obstacle to use this manual also for packaging testing procedures.

7. Comparing chapters 6.1, 6.3, 6.5 and 6.6 together with its genesis a larger number of repetitions can be realized, such as the principle of design type testing, UN-marking, types of testing etc. However, many of these parallels are not consistent, which was realized by the Netherlands in proposing an evaluation. Furthermore, by the addition of additional types of packaging the terminology has become more and more complicated (even in headings of chapters), thus leading to obstacles in understanding the differences. The merging of these four chapters would significantly support the intention to evaluate these chapters and would additionally streamline and simplify the packaging performance requirements.

Proposal

It is proposed

1. to consider the United Nations test manual as the place to put the packaging test procedures down.

In this case it is assumed that the performance levels, the role of the competent authority and other items are kept in Part 6.

2. To consider the merging of Chapters 6.1, 6.3, 6.5 and 6.6.
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