

## 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

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Item 4 (a) of the provisional agenda

### PACKAGINGS

#### Miscellaneous proposals

#### Comments on UN/SCETDG/25/INF3 regarding ISO 16106

Transmitted by the International Confederation of Drum Manufacturers (ICDM)

In UN/SCETDG/25/INF.3, the secretariat reproduces a letter from ISO, regarding ENISO/DIS - 16106.

This note does not intend to influence this standard which has been now voted and accepted in ISO, but to alert members on the risk of creating new standards only to clarify existing ones.

1. Most of the paragraphs in the body of the standard simply repeat ISO 9001; this does not seem to be useful.
2. When the text gives additional indications, it often makes it complex and confusing:

Example 1: Paragraph 7.1: Requests specifications to conform to annex B and C “which are extracted from ISO 16104 and ENISO 16467. These annexes are not applicable to product specification on large packaging”. Annex B1 gives in 5 parts a list of not less than 90 specification items and then annex B2 gives explanation on B1.

Example 2: Reference to many other text makes this standard very difficult to use:

- Paragraph 7.4: “accordance to EN 45014”
- Paragraph 7.5.3: “accordance with ENISO 16104 and 16467”
- Paragraph 8.2: Note 1 and 4: refers to chapter 6 of UN  
Note 2: refers to annex E, then D4 and D5  
Note 3: mentions that “test conditions may differ from the design type text”
- Annex A: “according EN 45012”
- Annex C2: “see ADR/RID 6.1.5.4”
- Annex D4: “see table B2 of ISO 16104”

3. Annex D and E are listing the controls to be done during production, including even a “typical” frequency and product performance retesting.

Appropriated controls depend predominantly on the process, equipment and systems of each supplier.

Additionally the wording in ISO 16106 is very far from specifying each control.

We believe therefore that the relevant parameters and the frequency of checking must stay under the responsibility of the manufacturer.

If performance retesting of final product is considered needed, it should be included in the UN Model Regulations.

### **Conclusion**

We want to advocate that when there is a perceived need for more clarity of an existing regulation or standard, then proposals should be made to upgrade the existing text, instead of creating new ones.

Any proposal concerning the packaging of dangerous goods should be submitted first to the UN Sub-Committee with documented justification.

Our understanding is that this is in line with the conclusion of the SCETDG in December 2003, regarding the danger to refer to various standards in the UN Model Regulations.

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