
**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-sixth session
Geneva, 29 November-7 December 2004
Item 3 (c) of the agenda

**OUTSTANDING ISSUES OR PROPOSALS OF AMENDMENTS TO THE
RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS**

Miscellaneous proposals

Comments on ST/SG/AC.10/C.3/2004/88,
proposed vibration test for design types of packaging
intended for the transport of dangerous goods

Transmitted by the International Confederation of Container Reconditioners (ICCR)

1. ICCR appreciates the extensive effort devoted to this subject by France. ICCR is continuing but has not yet completed its review of the proposed test as well as alternative approaches to meet the same goal, perhaps more efficiently.
2. This work builds upon concerns expressed by Experts in previous meetings, including the First session of the Committee in December 2002, with respect to dangerous goods packaging safety in transport. Discussions included the advisability to develop an additional performance test, or perhaps other means to ensure greater safety in the actual performance of packaging design types in transport.
3. ICCR is reviewing published data on vibration frequencies most often encountered in transport. In particular, we are exploring whether a relatively wide range of random frequencies, proposed by France, may be less appropriate than use of a more focused range of frequencies encountered in actual transport. Published data indicate that vibration occurs at specific known frequencies in particular modes of transportation. Future work should address how these recorded vibration frequencies might be reflected in a new test regimen, or perhaps in some other means to assure greater transport safety.
4. We support continued work to evaluate vibration and other design capabilities of dangerous goods packaging. In this regard, we explicitly reject the suggestions in INF 11 (ICDM) and 17 (SEFEL) that the UN work on improving dangerous goods packaging be discontinued. Whereas, as noted in INF 11, dangerous goods have been shipped with success in drums for over a hundred years, many aspects of drums and other packaging types have changed dramatically with implementation of UN performance standards. Past success with different and generally stronger packaging types is no assurance of continued success, given the trends in design under the current limited performance standards.

5. It is true that we have been discussing packaging for several sessions. Time spent on these efforts has not been wasted, however. We believe much valuable work has been done, but we also believe the Sub-Committee needs time in the next biennium in which to complete this work. We note from the provisional agenda for this session (ST/SG/AC.10/C.3/51/Add.1) that packaging performance is a subject carried forward for the 2005-2006 biennium.

6. It is our intention in this period to assemble the interests of all affected parties, not just manufacturers, but fillers and transporters, to address the details of any future packaging proposals in the next biennium. The goal will be to consider a range of alternative approaches including but not limited to new or enhanced design qualification tests, for assuring an adequate margin of safety in the performance of dangerous goods packaging in transport.
