

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 (c) of the provisional agenda

PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)

Approval of IBC'S
UV-Resistance of plastics used in IBC's
Comments to document ST/SG/AC.10/C.3/2005/2 of the expert from Australia

Transmitted by the International Confederation of Plastics Packaging Manufacturers (ICPP)

1. With paper ST/SG/AC.10/C.3/2005/2 the expert from Australia proposes
 - to introduce a classification for different levels of UV-protection of composite and rigid plastics IBC's
 - a corresponding marking for these levels
 - test methods for the classification
 - a requirement for so-called poor or moderate UV-resistant IBC's to transport them only in closed CTU's.
2. ICPP as the representative of the plastics rigid and composite IBC manufacturing industry is of the opinion that the current requirements concerning UV-protection of rigid plastics and composite IBC's in 6.5.3.3.2; 6.5.3.3.3 and 6.5.3.4.6; 6.5.3.4.7 are sufficient.
3. ICPP is of the opinion that any proposal to regulate the specification of UV-resistance must be directed to all types of plastics packagings and IBCs, including flexible IBCs.
4. ICPP believes there is not sufficient justification for the proposal. The expert from Australia mentions only a "potential for degradation" which is not sufficient for far-reaching amendments of the UN-Recommendations.

The academic discourse in chapters 3 and 4 of paper 2005/2 does not refer to the specific properties of plastics IBC's because the commonly used high-molecular HDPE is already UV-stabilized by the plastics manufacturer and the other mentioned materials are not relevant.

5. The plastics and IBC manufacturing industry has carried out extensive testing and research dealing with the phenomenon of UV degradation. This research is continuing. Tests in Florida and other UV-exposed regions determined the maximum additive content to guarantee the five-year lifetime under normal and foreseeable conditions of use.

6. In practice the proposed classification would require that all IBC's are equipped with UV-stabilisers for extreme conditions like in Australia, leading to an unjustified cost-benefit ratio. Creating multiple categories of UV protection levels has logistic, storage and reuse implications beyond control of OEM's or other certification bodies. The exclusive transport of the defined IBC's in CTU's is neither controllable nor practicable. CTU's are not defined in UN, and moreover curtain-sided containers are used extensively for land transport.
7. ICPP reminds the UN Sub-Committee that former proposals to amend the design type test criteria by taking into account extreme climate conditions were rejected. For example, proposals to change the temperature of the drop test from -18°C to -40°C (ST/SG/AC.10/C.3/1998/57, proposed by Finland) or from -18°C to room temperature (ST/SG/AC.10/C.3/1997/78, proposed by New Zealand) were not adopted as inappropriate harmonized world-wide conditions.

For the above reasons ICPP asks the UN Sub-Committee to consider the arguments presented by ICPP and to reject the proposal by the expert from Australia.
