

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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PERFORMANCE OF PACKAGINGS, INCLUDING IBCs

Comments on ST/SG/AC.10/C.3/2008/45 of Germany.

Transmitted by the expert from the Netherlands

The expert from The Netherlands has taken notice of document ST/SG/AC.10/C.3/2008/45 from the expert from Germany and would like to make the following comments.

The expert from The Netherlands fully supports the amendments as proposed for chapters 4.1 and 6.1 as far as it concerns the requirement, that any permeation shall not constitute a danger under normal conditions of transport.

However, the expert from The Netherlands does not support the provision that this danger can be accepted when a warning sign is placed on the transport unit in case of transport of substances with potential hazard of explosion caused by permeation. This provision would be contradictory to the requirement that any permeation shall not constitute a danger under normal conditions of transport. It is also not acceptable that ventilation would be necessary to avoid the danger of an explosion.

Further it is noted, that the danger which could occur because of permeation is not only an explosion danger, but that there could also occur a danger by permeation of substances with toxic properties. This would mean that an additional warning sign and additional provisions would have to be developed. The result will be a very complex set of regulations.

In addition, solving the problem of permeation of the packaging at the level of transport circumstances instead of measures to the packaging itself, will not solve the problem of permeation for other parts of the supply chain of the product, e.g. for storage and use.

The expert from The Netherlands thus supports the proposal with the following amendments:

- Deletion of Note 1.

- Delete “or if they are transported in well ventilated transport units or under cool conditions” in Note 2.
 - Delete the proposed 5.5.3.
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