

**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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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 6 (d) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: packagings**

Comments on document ST/SG/AC.1/C.3/2015/15

Transmitted by the expert from Norway

Reference document: ST/SG/AC. 1/C.3/2015/15

1. Norway welcomes the proposal from Germany concerning the temperature of the water used in the internal pressure (hydraulic) test for plastic packaging and IBC's.
2. However, after consultation with our certification body for packagings and IBCs we have some remarks:
 - (a) Composite packagings and composite IBCs with inner plastics receptacles should be included in the amendments.
 - (b) We believe it is the temperature of the water that shall be minimum 12 °C, and that the temperature shall be documented when the test sample is ready for testing. The temperature shall not be measured during the test. Thus, to avoid confusion we think the text should be made clearer on that.
 - (c) Test labs should be allowed (voluntary) to use a correction factor for the pressure when the water temperature is measured above 12 °C. This would make the pressure test results even more comparable between test labs. On the other hand, without a correction factor, an IBC might fail at 20 °C but pass at 12 °C. Reference can be given to the *Hydraulic pressure test* as described in ISO 16495:2013 *Packaging — Transport packaging for dangerous goods — Test methods*.

Proposal

Amend 6.1.5.5.3 to read as follows (new added text underlined):

“Special preparation of packagings for testing: either vented closures shall be replaced by similar non-vented closures or the vent shall be sealed.

For plastics packaging and composite packaging (plastic materials) the temperature of the water shall not be below 12 °C. The water temperature shall be documented for the test sample before the test is carried out. When the temperature is measured above 12 °C the internal pressure to be applied may be reduced with a correction

factor according to ISO 16495:2013 Packaging — Transport packaging for dangerous goods — Test methods”.

Amend 6.5.6.8.2 to read as follows:

“Preparation of the IBC for test

The test shall be carried out before the fitting of any thermal insulation equipment. Pressure-relief devices shall be removed and their apertures plugged, or shall be rendered inoperative.

For rigid plastics IBC and composite IBCs the temperature of the water shall not be below 12 °C. The water temperature shall be documented for the test sample before the test is carried out. When the temperature is measured above 12 °C the internal pressure to be applied may be reduced with a correction factor according to ISO 16495:2013 Packaging — Transport packaging for dangerous goods — Test methods”.
