

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

29 November 2017

Fifty-second session

Geneva, 27 November-6 December 2017

Item 3 of the provisional agenda

Listing, classification and packing

Comments on ST/SG/AC.10/C.3/2017/36, UN/SCETDG/52/INF.23 and UN/SCETDG/52/INF.45; Multiple marking of packagings, including IBCs and large packagings, indicating conformity with more than one successfully tested design type

Transmitted by the European Chemical Industry Council (CEFIC) and the Dangerous Goods Advisory Council (DGAC)

1. At the fifty-second session of the UNSCETDG document ST/SG/AC.10/C.3/2017/36 together with UN/SCETDG/52/INF.23 and UN/SCETDG/52/INF.45 were discussed with focus on two issues:

- (a) General permissibility of multiple UN marks applied to packages based on the conformance to more than one successfully tested design type.
- (b) Permissibility of multiple approvals for packages that simultaneously conform to design types of different kind and category as defined in Chapters 6.1, 6.5 and 6.6.

2. Consensus was reached on the permissibility of the current practice to issue multiple approvals for successfully tested design types which belong to the same regime of packages, i.e. among packaging design types defined in Chapter 6.1, among IBC design types defined in Chapter 6.5 and among large packaging design types defined in Chapter 6.6 individually.

3. To document the minimum consensus found during the discussion of the Sub-Committee, an interim text based on the proposal in UN/SCETDG/52/INF.23 by ICIBCA is proposed for locations in Chapters 6.1, 6.5 and 6.6:

“[6.1.3.13 Where a packaging conforms to more than one tested packaging design type, the packaging may bear more than one marking. Where more than one marking appears on a packaging, the markings must appear in close proximity to one another and each marking must appear in its entirety.]”

“[6.5.2.1.3 Where an IBC conforms to more than one tested IBC design type, the IBC may bear more than one marking. Where more than one marking appears on an IBC, the markings must appear in close proximity to one another and each marking must appear in its entirety.]”

“[6.6.3.4 Where a large packaging conforms to more than one tested large packaging design type, the large packaging may bear more than one marking. Where more than one marking appears on a large packaging, the markings must appear in close proximity to one another and each marking must appear in its entirety.]”

4. To finalize the whole topic on multiple approved packages, CEFIC/DGAC will come back with a formal proposal based on the views expressed in the discussion at the Sub-Committee to address the remaining issue of multiple approvals overarching between different kinds of packages, i.e. packagings vs. IBCs and IBCs vs. large packagings, at the next session of the Sub-Committee in summer 2018.
