

**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 3 of the provisional agenda

Listing, classification and packaging

**Comments on 2018/25: Clarification of performance testing
requirements for infectious substances packaging in
Chapter 6.3**

Transmitted by the expert from the United Kingdom

Introduction

1. The expert from the United Kingdom has researched the background to the inconsistency in the additional drop test for Class 6.2 packagings using dry ice, identified by the Canadian expert in ST/SG/AC.10/C.3/2018/25. We have to apologise to the sub-committee because the inconsistency was included in UK proposals in ST/SC/AC.10/C.3/2005/49 which revised much of the text of Chapter 6.3.
2. Prior to the adoption of the new text the extra single sample drop test requirement was clearer in that the drop tests for both boxes (5 samples) and drums (3 samples) were contained in the same paragraph and there were no examples. The key element was that the package was subjected to the 9m free fall drop test. The subsequent refinement of the text to indicate that the drop attitude is to be the one most likely to cause failure, further highlights the contradiction between the intention and the example.
3. The expert from the United Kingdom therefore fully supports the proposal in paragraph 6, to delete the “five times after conditioning”.
4. In relation to the proposal in paragraph 7, the expert from the United Kingdom is mindful of how the experts at the time would have approached the revisions they were making to Chapter 6.3, and the strong use of precedent and consistency with other chapters in the Model Regulations. The expert from the United Kingdom has found that the approach used in Chapter 6.3 is consistent with Chapter 6.1. With the drop height requirements and the orientation requirements in separate paragraphs. It was also noted that there are fewer sub-headings in chapter 6.3 than chapter 6.1.
5. Since the proposal in paragraph 7 would create an inconsistency with chapter 6.1 the expert from the United Kingdom does not support this proposal but an alternative more consistent proposal is included in paragraph 10.
6. In respect of the proposal in paragraph 8, the expert from the UK appreciates that many drums do not have chimes (particularly plastics ones) and so the test could be potentially partially avoided by strict observance to the existing text. The incorporation of the text from chapter 6.1 seems appropriate, but in that chapter the text is being used in a

different context. In Chapter 6.1 no orientation for the drop test is specified but this is not the case in 6.3.5.3.3.

7. Given this difference, the expert from the United Kingdom does not support the proposal in paragraph 8 but proposes a much simpler alternative in paragraph 11.

8. In splitting the box and drum drop orientations into two paragraphs, the original drafters missed a consequential amendment as 6.3.5.3.6.3 only refers to box orientations (6.3.5.3.2), but should also have included drum orientations in 6.3.5.3.3. The expert from the United Kingdom notes that this omission has been identified by the expert from Canada and is covered by their proposal in paragraph 9.

9. The expert from the United Kingdom therefore fully supports the proposal in paragraph 9 adding “or 6.3.5.3.3 as appropriate”.

Proposals

10. As an alternative to the Canadian proposal in paragraph 7 and to improve consistency within the Recommendations, add the following sub-headings after the following paragraph references:

6.3.5.3.1 *Drop height and target*

6.3.5.3.2 *Number of test samples and drop orientation (Boxes)*

6.3.5.3.3 *Number of test samples and drop orientation (Drums)*

11. As an alternative to the Canadian proposal in paragraph 8 based on the fact that the existing text in 6.3.5.3.3 predetermines the orientation for the drop test and therefore it is not necessary to describe the features of the packaging:

In 6.3.5.3.3 (a) after the word top delete the word chime;

In 6.3.5.3.3 (b) after the word base delete the word chime
