

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 6 (b) of the provisional agenda

Miscellaneous proposals for amendments to the Model

Regulations on the Transport of Dangerous Goods:
packagings

Comments on 2018/49: Multiple marking of packagings, including intermediate bulk containers (IBCs) and large packagings, indicating conformity with more than one successfully tested design type (part II)

Transmitted by the expert from the United Kingdom

1. This information paper is related to paragraph 7 onwards in ST/SG/AC.10/C.3/2018/49, submitted by CEFIC and DGAC. In particular, it addresses the matter of approvals that could be given to two different design types such as packaging and large packaging, or packaging and IBC.
2. The origins of this blurring between packaging and large packaging or packaging and IBC, can be traced back to an amendment that first appeared in the 18th edition of the Model Regulations in Chapter 6.1, from a paper submitted by Germany (ST/SG/AC.10/C.3/2011/34). The issue raised at the time related to a box of 2300 x 800 x 300mm which had a capacity of 552 litres, but a gross mass of 25kg to 30kg. The box did not therefore meet the scope for testing as a packaging in Chapter 6.1, and because it was so light and was apparently not fitted with any means of mechanical handling it did not meet the definition of large packaging in 1.2.1. The alternative use of a W marked package was ruled out because it only relates to variances in the design in 6.6.4.
3. The amendment changed 6.1.1.1 (d) from “Packagings with a capacity exceeding 450 litres” (17th and earlier editions) which gave a clear demarcation to “Packagings for liquids, other than combination packagings, with a capacity exceeding 450 litres.” The current issues seems to be a direct and unanticipated consequence of this amendment. It therefore follows that undoing this amendment would help to restore the division between packagings and large packagings, and packagings and IBCs.
4. The expert from the United Kingdom has recently seen a number of approval certificates that have been issued as 4A, where the packagings have volumes over 1000 litres **and** have pallet type fork lift bases, but have contents restricted to 400kg net mass. We have been unable to obtain copies of the test reports to ascertain if these packages have been tested according to chapter 6.1 or chapter 6.6. The expert from the United Kingdom believes that the certifying body may have overlooked the definition of a large packaging in issuing the approval in these cases. Large packaging (b) “exceeds 400 kg net mass or 450 litres capacity but has a volume of not more than 3 m³”. There are no caveats for liquids because a large packaging can only contain inner packagings or articles.

5. Based on this analysis, the expert from the United Kingdom believes that if the current provisions are properly applied then there should be no instances where a packaging can also be approved as either a large packaging or an IBC. Dual marking of an IBC and a large packaging is a possibility where testing has been done for say solids (IBC) and again for articles (large packaging). It might be advantageous for the sake of clarity to reassert the division by returning the text in 6.1.1.1 (d) to its original form.
