

European Secretariat of Manufacturers of Light Metal Packaging (SEFEL)

INF .58

Programme of Work/Programme of work for the 2001/2002 biennium and related proposals

Shortcomings of existing technical requirements for UN testing of different types of packagings and IBCs used for the transport of various of liquids, in relation with resistance against perforation and permanent deformation due to any type of impact during transport

Transmitted by the expert from Spain (ST/SG/AC. 10/2000/12)

Spain during the last two years continually has come up with new proposals regarding packaging requirements and packaging tests:

- July 1999 proposal of minimum wall thickness
- December 1999 proposal of vibration test
- December 2000 proposal of perforation test

Spain has given no reasons for any of these proposals nor proved their necessity. On the contrary the hopping from one proposal to the other and from one test to the other suggests that there is some uncertainty about the real transport situation on the one side and some doubt regarding the benefit of the tests meanwhile proposed on the other.

The declaration of Spain in their proposal 2000/12 that the weight of some specific packagings has been reduced by 35 % over the last 12 years does not come true for those steel packagings represented by SEFEL.

SEFEL furthermore has requested the steel as well as the tinplate industry to comment on the declarations also made by Spain in their proposal 2000/12:

The following statements of Spain have proved not to be true:

- that steel (or tinplate) shows inferior hardness values than steel (or tinplate) used 20 or 25 years ago and
- that steel (or tinplate) show elasticity values higher than 40 or 45 %.

According to the European steel (and tinplate) industry:

- there have been no basic changes of the mechanical-technological properties of steel (and tinplate) during the last 20 years
- the elasticity values of steel for packaging are 40 % and of tinplate for packaging are 32 to 37 %

If Spain or some other countries make complaints about damage to packagings, these countries should check whether their competent authorities fulfill the following basic requirements of the UN Model Regulations:

- 6.1.1.4 Packagings shall be manufactured and tested under a quality assurance programme which satisfies the competent authority in order to ensure that each manufactured packaging meets the requirements of this Chapter.
- 6.1.5.1.3 Tests shall be repeated on production samples at intervals established by the competent authority.
- 6.1.5.1.8 The competent authority may at any time require proof, by tests in accordance with this section, that serially-produced packagings meet the requirements of the design type tests.

Until they have properly done their “homework”, and produced the data proving the inadequacy of current specification and test methods, such countries should not demand new tests.

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