
Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

3 June 2021

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-eighth session

Geneva, 28 June-2 July 2021

Item 6 (d) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: Other miscellaneous proposals

Rolling Hoops Requirement for Steel Drums - 6.1.4.1.4

Transmitted by the expert from Canada

Introduction

1. This document is seeking clarification to the requirement for rolling hoops on steel drums.
2. Currently, paragraph 6.1.4.1.4 defines the design requirements for rolling hoops on steel drums as follows (relevant parts for clarification **in bold**):

“6.1.4.1.4 The body of a drum of a capacity greater than 60 litres **shall, in general,** have at least two expanded rolling hoops or, alternatively, at least two separate rolling hoops. If there are separate rolling hoops they shall be fitted tightly on the body and so secured that they cannot shift. Rolling hoops shall not be spot welded.”
3. The wording of this paragraph introduces ambiguity on whether the rolling hoops requirement represented by ‘shall’ is indeed a mandatory design requirement for steel drums of a capacity greater than 60 liters, or an optional requirement based on the less restrictive ‘in general’ term that follows.
4. Canada understand that competent authorities have interpreted and subsequently implemented paragraph 6.1.4.1.4 within their own regulations as being either a mandatory or optional requirement.
5. We acknowledge that a mandatory requirement for rolling hoops on steel drums is inconsistent with the objective of the performance-based packaging regime and that other design types of drums made of different materials do not require rolling hoops.

Discussion

6. Canada is seeking clarification on whether the text ‘in general’ that follows the ‘shall’ was added to specify that if rolling hoops are required, there should be at least two or more, or, if the text ‘in general’ was intended as a relaxation on the requirement for rolling hoops, allowing rolling hoops to be an optional design requirement for drums of a capacity greater than 60 liters, rather than a mandatory requirement.
 7. The clarification requested above is also applicable to paragraphs 6.1.4.2.3 for aluminum drums and 6.1.4.3.3 for drums of metal other than steel or aluminum.
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