



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 (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 Metal Drums

Transmitted by the experts from Canada and the International Confederation of Drum Manufacturers (ICDM)*

Introduction

1. At the fifty-eighth session of this Sub-Committee, Canada presented informal document [UN/SCETDG/58/INF.11](#). This informal document requested clarification on the requirement for rolling hoops on drums, given the ambiguity (shown in bold) of 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*”.
2. Following the discussions of the Sub-Committee, this working document proposes modifications to clarify the requirements for rolling hoops on steel drums. The modifications would also apply to aluminium drums and drums of metal other than steel or aluminium.
3. As stated in the “Nature, Purpose and Significance of the Recommendations”, the “*Model Regulations have been drafted in the mandatory sense (i.e., the word “shall” is employed throughout the text rather than “should”) in order to facilitate direct use of the Model Regulations as a basis for national and international transport regulations*”. By this account, “shall” is used to describe mandatory requirements within the UN Model Regulations, whereas “may” is used to express an option or a permissive requirement. Thus, the use of “shall” within 6.1.4.1.4 would denote that rolling hoops are a mandatory requirement for drums of a capacity greater than 60 litres but the “*in general*” introduces ambiguity.
4. Due to the phraseology of the “*shall, in general*”, this drum construction clause has been integrated into various national regulations as either a mandatory (i.e. “shall”) requirement for rolling hoops on drums or an optional (i.e. “may”) one, or as is written in the UN Model Regulations.

* A/75/6 (Sect.20), para. 20.51.

5. Within informal document [UN/SCETDG/58/INF.31](#), the International Confederation of Drum Manufacturers (ICDM) present that rolling hoops are intended for handling purposes and not for transport safety.
6. The report from the fifty-eighth session of the Sub-Committee noted a general opinion that rolling hoops facilitate the handling of drums and competent authorities do not consider the presence or absence of rolling hoops on drums to be a safety issue. The report further denotes that there was no intent to consider the provisions of 6.1.4.1.4 in the UN Model Regulations as a mandatory requirement.
7. The authors of the paper opine that any reticence on changing this clause due to safety reasons is unsubstantiated, since competent authorities can still choose to incorporate the clause into their national regulations as mandatory or optional, given the ambiguous wording.

Proposal

8. Since the Sub-Committee experts have agreed that rolling hoops are intended primarily for handling, the experts from Canada and ICDM propose to amend 6.1.4.1.4 to promote consistent application of this construction clause across all national regulations. The proposed modification reads as follows (deleted text in strikethrough, new text underlined):

“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.~~ Drums may have rolling hoops, either expanded or separate. 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.”

9. The modification requested above is also applicable to paragraphs 6.1.4.2.3 for aluminium drums and 6.1.4.3.3 for drums of metal other than steel or aluminium.