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, including the use of recycled plastics material

Duplicated text in 4.1.1.12

Transmitted by the expert from Spain*

Introduction

1. Chapter 4.1 of the UN Model Regulations is dedicated to the use of packagings, including intermediate bulk containers (IBCs) and large packagings.

2. The general provisions in paragraph 4.1.1.12 are dedicated to the leakproofness test:

   “Every packaging as specified in Chapter 6.1 intended to contain liquids shall successfully undergo a suitable leakproofness test. This test is part of a quality assurance programme as stipulated in 6.1.1.4 which shows the capability of meeting the appropriate test level indicated in 6.1.5.4.3:

   (a) Before it is first used for transport;

   (b) After remanufacturing or reconditioning of any packaging, before it is re-used for transport.

   For this test the packaging need not have its closures fitted. The inner receptacle of a composite packaging may be tested without the outer packaging, provided the test results are not affected. This test is not necessary for inner packagings of combination packagings or large packagings.”

3. Chapter 6.1 is dedicated to the requirements for the construction and testing of packagings and in paragraph 6.1.1.3 the same text is included as in paragraph 4.1.1.12 on the leakproofness test.

4. Chapter 6.5 is dedicated to the requirements for the construction and testing of intermediate bulk containers. And paragraph 6.5.4.4.2 includes the same text that in the paragraph 4.1.1.12 on the leakproofness test.

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

5. The UN Model Regulations devote Chapter 4 to the use of packaging, and Chapter 6 contains instructions on construction and testing. Therefore, the leakproofness test should be covered in Chapter 6.

6. The UN Model Regulations try to avoid duplication of requirements, thus avoiding repetition and lack of clarity in the requirements to be fulfilled. The text should be only placed in one chapter, and as being a requirement for the testing of the packagings it will not be looked for in Chapter 4.

7. Taking into account the above, it might be considered that the duplicated text in paragraph 4.1.1.12 should be deleted.

Proposal

8. Spain proposes deleting paragraph 4.1.1.12.