

## 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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Miscellaneous proposals for amendments to the Model Regulations

on the Transport of Dangerous Goods: Packagings, including the use of recycled plastics material

### Proposal for amendments to paragraph 6.1.5.2.4 of Chapter 6.1 of the Model Regulations concerning the preliminary testing of plastics packagings

Submitted by the International Dangerous Goods and Containers  
Association (IDGCA)

#### Introduction

1. In accordance with paragraph 6.1.1.2 of Chapter 6.1 “Methods of testing other than those described in these Regulations are acceptable, provided they are equivalent”. In accordance with paragraph 6.1.4.8.1 “The packaging shall be manufactured from suitable plastics material and be of adequate strength in relation to its capacity and intended use. In accordance with paragraph 6.1.5.1.1 “The design type of each packaging shall be tested as provided in 6.1.5 in accordance with the procedures established by the competent authority.” In accordance with paragraph 6.1.5.2.4 “Additional steps shall be taken to ascertain that the plastics material used in the manufacture of plastics drums, plastics jerricans and composite packagings (plastics material) intended to contain liquids complies with the requirements in 6.1.1.2, 6.1.4.8.1 and 6.1.4.8.3. This may be done, for example, by submitting sample receptacles or packagings to a preliminary test extending over a long period, for example six months, during which the samples would remain filled with the substances they are intended to contain, and after which the samples shall be submitted to the applicable tests listed in 6.1.5.3, 6.1.5.4, 6.1.5.5 and 6.1.5.6.”

The Model Regulations do not provide any other methods to ascertain the conformity of the packaging material for the possibility of transporting dangerous substances.

2. In our opinion, the highlighted method of testing is effective enough, but risky and potentially dangerous for people and environment and should have strict procedure to maintain safety. It also creates unnecessary costs since the packagings filled by different substances need to be transported to laboratory.

3. However, there are other methods to test the material resilience that are ecologically safer, for example, testing a piece of plastic material cut out from the sample packaging in a laboratory to see how it reacts to different substances and other factors. This method is described in ISO 175:2010 standard.

## **Proposal**

4. IDGCA requests to consider our document and take appropriate actions.

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