



Secretariat

Distr.
GENERAL

ST/SG/AC.10/C.3/2000/39
12 April 2000

ORIGINAL : ENGLISH

**COMMITTEE OF EXPERTS ON THE TRANSPORT
OF DANGEROUS GOODS**

**Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Eighteenth session, 3-14 July 2000,
agenda item 5 (d))

**MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Packaging Requirements

Transmitted by the expert from the United States of America

1. A filler of a UN performance packaging must in all cases take certain steps to complete a package so that as presented for transport it will meet the UN design requirements. Steps for completing packages range from sealing fibreboard boxes to the torquing of closures on drums. A review of the US dangerous goods incident database shows that a large number of incidents are attributable to improper closure. While the proper completion of these steps is essential to the package meeting the performance requirements, there is currently no requirement in the Model Regulation requiring that the packaging manufacturer provide instructions on how a package must be completed. While many packaging manufacturers currently provide such guidance (e.g. it is not uncommon to find instructions for packing on the underside of a fibreboard box flap), the adequacy and consistency of these types of instructions vary significantly from one manufacturer to another.
2. A second concern is that the proper materials and items are used in the completion of the packagings, particularly when these materials or items are not provided by the packaging manufacturer. These materials and items could include tape or glue in the case of fibreboard packagings or closures, gaskets and closure rings in the case of drums. Again, it is essential to the performance of the packaging that the proper materials and items are used and experience has shown that dangerous goods incidents have been caused by the use of inappropriate materials or items.

GE.00-

3. The expert from the United States believes that packaging manufacturers should be required to provide instructions relevant to the completion of packagings and identify the specifications of all materials and items needed. On this basis it is proposed to include requirements in Chapters 6.1, 6.3, 6.4, 6.5 and 6.6 that are applicable to packaging manufacturers. It is also proposed that an additional requirement be included in Part 4 requiring that each package is completed in conformance with the manufacturers instructions and that the appropriate materials and items are used.

Proposal

4. It is proposed that the following text be added as new paragraphs 6.1.1.5, 6.3.1.3 and 6.4.2.12:

“6.1.1.5 Packagings distributed for filling shall be accompanied:

- .1 with the specifications of any materials or items not provided with the packagings, and
- .2 with instructions on all remaining steps

required to ensure that a package when filled conforms with the design requirements of these Regulations.”

5. It is proposed that the following text be added as a new paragraph 6.5.1.1.4:

“IBCs distributed for filling shall be accompanied:

- .1 with the specifications of any materials or items not provided with the IBCs, and
- .2 with instructions on all remaining steps

required to ensure that the IBCs when filled conform with the design requirements of these Regulations.”

6. It is proposed that the following text be added as a new paragraph 6.6.1.3:

“Large packagings distributed for filling shall be accompanied:

- .1 with the specifications of any materials or items not provided with the large packagings, and
- .2 with instructions on all remaining steps

required to ensure that the large packagings when filled conform with the design requirements of these Regulations.”

7. It is proposed that a new sentence be inserted in 4.1.1.1 as the third sentence as follows:

“Packagings, including IBCs and large packagings, shall be closed using materials and items specified by the manufacturer and in accordance with instructions specified by the manufacturer.”
