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**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**
(Twenty-first session, 1-10 July 2002
agenda item 6)

PACKAGINGS

Vibration test proposal (ST/SG/AC.10/C.3/2002/2)

Transmitted by the International Confederation of Drum Manufacturers (ICDM)

1. The UN Sub-Committee in December 1999 stated in Paragraph 100 of its Report (ST/SG/AC.10/C.3/34):

“Following a majority vote, the Sub-Committee decided that, in principle, at some time in the future, a vibration test should be included in the Model Regulations, on the understanding that the forms the test would take and the criteria for it were still to be defined and should take account of pertinent ISO standards and existing vibration test standards. The expert from Spain would work on the vibration test with the cooperation of other countries, coordinating their work.”
2. ICDM/ICCR expressed a desire to try and make progress on this subject by requesting details of pertinent accidents and incidents from competent authorities in order to analyze any deficiencies in packagings related to vibration and propose if necessary suitable solutions (see ST/SG/AC.10/2000/6). To date there has been only an input from Germany and that data did not reveal any accident or incident caused by vibration.
3. The proposal from Spain, although covering all packagings, only singles out steel drums as a problem area and implies that double-seamed steel drums do not withstand vibrations encountered during transport but triple-seamed drums do. This is incorrect, as many designs of drums with double seams are capable of passing the proposed test.
In addition the issue of identifying constructional techniques is contrary to the UN principle of performance based standards.

4. There are strong concerns on the universal applicability of a vibration test and several experts have previously highlighted this as a significant stumbling block. With reference to the above report paragraph 98 stated:

“.....vibration tests were costly and difficult to put into practice and therefore difficult to apply in many countries.....”

5. It is disappointing that the Spanish Expert has clearly not addressed fully the request of the Sub-Committee to work in cooperation with other parties to address the problems covering all packaging design types.

It is considered essential that the safeguards introduced by the UN Experts to ensure packagings continue to meet the original design type tests according to the following:

- "6.1.1.4 Packagings shall be manufactured, reconditioned and tested under a quality assurance programme which satisfies the competent authority...";
- "6.1.5.1.3 Tests shall be repeated on production samples at intervals established by the competent authority.....";
- "6.1.5.1.8 The competent authority may at any time require proof, by tests... that serially-produced packagings meet the requirements of the design type tests."

are seen to be enforced at national level, and subsequently incidents recorded and analysed before precipitating a primary test of such magnitude.
