

**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-third session, 30 juin-4 July 2003  
Agenda item 4 (b))

## PACKAGINGS

**Comments on ST/SG/AC.10/C.3 2003/10: Package testing: Referencing  
ISO 16104 in the Model Regulations**

**Transmitted by the International Confederation of Container Reconditioners (ICCR)**

1. In ST/SG/AC.10/C.3 2003/10, the United Kingdom has proposed to remove significant portions of Chapter 6.1.5, reference ISO 16104 (Packaging – Transport packaging for dangerous good – Test Methods), and restructure the remainder of the Chapter.

2. ICCR does not support this proposal for the following reasons:

(a) The referenced ISO standard was only recently approved and, as a result, neither Experts nor Observer groups have had adequate time to review the final text.

(b) Based upon a review of the draft-final text, substitution of the standard would alter substantially the UN package testing text in 6.1.5.

(c) The draft-final standard includes approximately 50 pages of single-spaced text, as well as numerous drawings, charts and Annexes. Several of the Annexes are “informative” (i.e., not compulsory), and several are “normative” (i.e., compulsory). Chapter 6.1.5 currently has no annexes, and has not used or defined the terms “informative” or “normative.” This raises a question regarding the manner in which these Annexes would be viewed by users of the Model Regulations.

(d) The draft-final standard includes significant variations from current UN package testing language, including new definitions of key terms. For example, the standard uses a different definition of the term “packaging” than is found in the UN; and, a new term, “brimful,” is introduced.

(e) The draft-final standard makes extensive use of “Notes” intended to explain text or offer additional guidance to users of the standard. These notes may be subject to broad interpretation by users.

(f) Direct substitution of UN regulatory text by language derived from a standard may, in some cases, assist users in complying with highly technical requirements (e.g., gas cylinder standards). In such cases, a specific proposal should be presented to the UN for review.

(g) Direct substitution of UN text by a standard would compel users to comply with procedures that were created by a body not associated with the UN Sub-Committee or Committee of Experts. In fact, most, if not all, members of the CEN/ISO working group that created the referenced standard come from non-governmental organizations, quasi-governmental

organizations, and industry. The Sub-Committee should discuss the appropriateness of incorporating text written by such groups directly into the Model Regulations.

(h) Adoption of standard-based text could shift the ultimate responsibility for maintaining key UN language from the UN Experts to non-governmental and industry representatives. UN experts would need to attend the ISO meetings in order to keep abreast of developments to the standard.

(i) Efforts to maintain textual harmony between ISO 16104 and the UN Model Regulations would be difficult to coordinate. The UN process takes two years, while changes to international standards can take much longer. Consequently, it is likely the two texts would rarely be fully harmonized. This would create compliance and, possibly, safety problems for users.

(j) The proposed text is quite complex and likely would increase the cost of package testing in many parts of the world.

3. ICCR believes that the current UN text on testing should remain in place. Should the UK or other Experts want to improve current UN testing provisions, specific proposals should be presented to the UN Sub-Committee for consideration.

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