

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

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PACKAGINGS (INCLUDING IBC'S AND LARGE PACKAGINGS)

Comments on ST/SG/AC.10/C.3/2004/70 (Netherlands)

Transmitted by the expert from Belgium

Introduction

The expert from Belgium appreciates the work done by the expert from the Netherlands on the UN packaging requirements. Some of the proposals, contained in ST/SG/AC.10/C.3/2004/70, nevertheless give rise to the comments and proposals indicated below.

Comments and proposals

1. The wording of the proposed new 6.1.1.1 (d) is rather confusing. The expert from Belgium prefers the insertion of an explanatory note in (d) with the following content:
"NOTE: In the case of combination packagings, the capacity limit of 450 litres applies to the total capacity of the inner packagings."
2. It is a good idea to indicate how to round off the maximum gross mass in 6.1.3.1 (c) (ii). But the figures that are being proposed lead to a precision that can be as low as 25 % (when a gross mass of ca. 2 kg is rounded off to the nearest 0,5 kg). In the opinion of Belgium, the precision should be at least 5 %.

It is therefore proposed to change the proposed addition to: "rounded off to 1 kg for a gross mass greater than 20 kg, to 0,5 kg for a gross mass between 10 and 20 kg and to 0,1 kg for a gross mass smaller than 10 kg".

3. Because of the changes that are proposed to 6.1.4.18.2, the explanation of the words "water resistant ply" and "water resistant barrier" becomes very complicated. It is to be found in two places (with differences), and the examples of water resistant plies and barriers are mixed.

It is therefore proposed to replace the part of 6.1.4.18.2 after the first sentence with: "Where there is a danger of the substance contained reacting with moisture or where it is packed damp, a water resistant ply or a water resistant barrier shall also be placed next to the substance. Joints and closures shall be waterproof.

NOTE: A water resistant ply can consist of double-tarred kraft paper or of kraft paper with a suitable coating (e.g. plastics). A water resistant barrier can be plastics film bonded to the inner surface of the bag or one or more inner plastics liners."

4. In 6.3.1, the sequence of the sub-sections concerning marking differs unnecessarily from the one used in 6.1.1.

It is therefore proposed to change that sequence as follows (the numbering is the one used in document ST/SG/AC.10/C.3/2004/70 of the Netherlands):

6.3.1
6.3.1.1
6.3.1.2
6.3.1.6
6.3.1.7
“Marking”
NOTE 1
NOTE 2
NOTE 3
6.3.1.4
6.3.1.3
6.3.1.5

With this new sequence it is possible to simplify the first line of 6.3.1.3 to “The marking shall show: “

5. In the proposed section 6.3.2, there is no paragraph corresponding to 6.1.5.1.9. The expert from Belgium therefore proposes to add a new 6.3.2.1.8, with the same content as 6.1.5.1.9.
6. The last sentence of 6.3.2.2.1 of the proposal is already covered in 6.3.1.2. The expert from Belgium therefore proposes to eliminate that sentence.
7. Sub-section 6.3.2.5 (d) can be editorially improved : the wording “the packaging shall strike the target on the weakest part “ could mean “on the weakest part of the target”. It is therefore proposed to replace this text with “the packaging shall strike the target with its weakest part “
8. Taking account the changes proposed to Chapter 6.5, Belgium proposes to replace the heading 6.5.1 with : **“6.5.1 General requirements”**.
9. Sub-section 6.5.4.5 deals with repair and routine maintenance, and does not belong in the section concerning testing, certification and inspection. It is proposed to insert it at the end of 6.5.3 (or as a new 6.5.3.1.9 to avoid the renumbering of the subsequent paragraphs).
10. In 6.5.4.6.3, the correct paragraph number is 6.5.4.6.1 instead of 6.5.1.6.6.1.
11. Paragraph 6.6.5.2.4 belongs immediately after 6.6.5.2.1; it deals with the same subject. In the chapter on IBCs, the equivalent 6.5.4.1.3 also follows the counterpart of 6.6.5.2.1.
12. It is proposed to improve the text of paragraph 4.1.1.5.3 editorially as follows: start the first sentence with : “In the case of division 6.2 packagings, the following variations in the primary receptacles placed within a secondary packaging are allowed without further testing of the completed package, provided an equivalent level of performance is maintained: “
