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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-sixth session
Geneva, 29 November-7 December 2004
Item 3 (c) of the agenda

OUTSTANDING ISSUES OR PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Miscellaneous proposals

Comments on document ST/SG/AC.10/C.3/2004/88 and Adds. 1-3 (France)

Transmitted by the European Secretariat of Manufacturers of Light Metal Packaging (SEFEL)

The UN Sub-Committee of Experts on the Transport of Dangerous Goods (UN SCETDG) decided in December 1999, 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.“

Now for the first time a concrete text proposal has been tabled via document ST/SG/AC.10/C.3/2004/88 from France. Our main observations from ST/SG/AC.10/C.3/2004/88 are:

- That the different test reports revealed that **a number of packagings** were not capable of resisting the vibrations during tests;
- That the introduction of a vibration test is to be performed **on design types of packagings**;
- That the vibration profile for a most suitable vibration test procedure should be in accordance with **ISO 13355-2003**;
- That the **duration of the test differs** from packing group I to III (Packing group I: 2 hours; PG II: 1 hour; PG III: 30 minutes);
- That the **cost for new test** would be approximately an additional € 500 to € 1.000 per design type;
- That a **transitional period of five years** for implementation of this new test is recommended;
- That packagings or IBCs for **liquids** with a **capacity greater than 60 litre** are concerned.

Bearing in mind the last main observation – SEFEL would like to give its comments to document ST/SG/AC.10/C.3/2004/88:

- We are still missing statistical data of incidents raised to justify the introduction of a vibration test.
- No evidence is given that the proposed vibration test correlates with realistic and normal conditions of transport.

- The test parameters used are selected not on the basis of realistic and normal conditions of transport but – it seems – “at random”; e. g.: although ISO 13355-2003 is considered within the proposal as the most suitable test routine a) the proposed duration of the test differs for different packaging groups, and b) this variation is not justified.
- The results of the proposed vibration test leads to the result, that a number of packagings failed although they resist the normal conditions of transport as documented by the practice well-known. This is therefore an indication that the proposed test is not really reproducing the common experience of users/shippers by the application packagings for the transport of dangerous goods.
- The introduction of new test methods for packagings have to be associated with a additional benefit of safety for all parties involved. SEFEL does not believe that the proposed test makes a contribution to this aim. In this context it has to be allowed to ask the question whether a „more for safety“ of packagings is missed by the experts of UN SC-TDG.
- The mention of costs for such a test must not become any argument for its introduction.
- During the discussion concerning the introduction of a vibration test it was argued from time to time that „wrong“ packagings will be applied by the users for transport conditions where these packagings will fail; therefore a vibration test has to be implemented. Such a line of argument disregards totally the common practice of packaging manufacturer – also in his responsibility – explaining to and advising the user during his selection of the right packaging for the special application.
- SEFEL would like to ask the experts of UN SC-TDG to stick to the general understanding as entered in the minutes of the meeting in December 2002 that any new proposal to change the well-tried United Nations requirements shall be justified by problems clearly identified and listed.
- As above mentioned, a general decision on the introduction a vibration test was made in December 1999. Since this time no accurate arguments were given – although some working and informal documents were tabled – which describe the evidence of the necessity for the introduction of a vibration test. In addition it is possible to consider this decision as a recommendation (“a vibration test should be included ...”). Therefore it must be possible to re-decide the older decision of 1999 and to delete this item from the future agenda.

As a consequence SEFEL is not in favour to support the proposed test and asks for consideration of its arguments.

Furthermore we do not consider the French proposal as an additional source of evidence for the introduction of a vibration test as requested by the chairman of UN SC-TDG at the Meeting in December 2003. Therefore, we would like to ask the experts of UN SC-TDG to remove this matter as agenda item from the work program for the next biennium.
