
**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

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Item 3 (c) of the agenda

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

Miscellaneous proposals

Vibration test for design types of packagings and IBCs

Comments on ST/SG/AC.10/C3/2004/88 +Add 1,2,3 (France)

Transmitted by the expert of Germany

France has submitted a detailed proposal on the introduction of an additional performance test as part of the design type qualification test regime for certain types of packagings and IBCs.

This proposal is considered to be an answer to the resolution by the Sub-Committee at its 17th meeting in December 1999 which is documented as follows:

“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 vibrations standards. ...” (see ST/SG/AC.10/C.2/34, para. 100)

Since then, the issue has been treated further based on additional papers and proposals (see reports on 21. and 22. meeting of the Sub-Committee). During all these discussions a major argument has been stressed – the justification. All earlier attempts to cover this point, all documents submitted so far, did not satisfy.

The expert from Germany considers the proposal of an additional design type test for packagings and IBCs as a major change to the Model Regulations with impact on a large number of test houses, manufacturers and users, a change for which a justification is indispensable. Such justification would need to include a description of the safety gap in terms of percentage of spillages caused by vibration in relation to other types of failure, number of leaking packages per shipping volume or similar, based on statistical relevant data as well as an outlook on the estimated benefit as a result of the additional requirement.

Since December 1999 when this justification was asked for the first time, 5 years have elapsed offering sufficient time to collect data, evaluate the risk and to submit a traceable justification. Despite repeated emphasis of this important point, any proposal so far failed to provide for a justification.

In line with our national experience, the omitted justification indicates that there is evidently no safety gap to be closed. The expert from Germany, therefore, is currently not persuaded to support any proposal for the introduction of a vibration test.

Furthermore he considers a basic presupposition for the resolution taken by the Sub-Committee at its 17th meeting in December 1999 – the justification - as not provided and favors a withdrawal of it.
