

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

Thirtieth session
Geneva, 4-12 (a.m.) December 2006
Item 2 (a) (i) of the provisional agenda

Packaging performance Provision concerning the Drop test Impact surface Comment on ST/SG/AC.10/C3/2006/81

Transmitted by the International Confederation of Steel Drums Manufacturers (ICDM)

Introduction

At its twenty-ninth session the Sub-Committee have adopted amendments describing the drop test target (6.1.5.3.4) based on a proposal from France. In document ST/SG/AC.10/C.3/2006/81, DGAC/ICCR is suggesting to maintain the existing text.

ICDM have discussed the feasibility of the proposed specification with its members and propose to reconsider the adopted provision.

Discussion

It is well known that the rigidity of the impact surface of a drop test has a major impact on the test result. As such ICDM welcome the effort by France to try to define what should be the specification of such a floor.

We questioned our members on the proposed test floor specification.

The feedback received, from many ICDM Members from all over the world and including Test Houses in Europe, is as follow:

In some countries in Europe, members and test houses do comply with the mass factor of 50 for large steel drums, but some may have a problem with the flatness and recognise a major issue for IBC.

Several countries in Europe and all the members outside Europe indicated that basically almost all the test floors in use now in their countries would not comply with the new specification.

Furthermore, as shown by DGAC/ICCR document the construction of a compliant floor would represent a major investment when the floor must be compliant for large drums and IBC.

It is felt by many experts involved in testing, that the floors in use are rigid enough to represent real life conditions and that the cost of changing for this new specification would not add in transport safety.

Conclusion

ICDM support the proposal made in Document 2006/81 to maintain the existing text. In order to better guide the users regarding the specification of the floor, a note may be added giving ISO 2248 as a “guidance”; alternatively a better understanding of what should be a compliant floor, may be looked at by the sub-committee during the next biennium.