

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

Provisions concerning the drop test area

Transmitted by the International Confederation of Intermediate Bulk Container Associations (ICIBCA)

- (1) At the 29th session, the Sub-Committee took action on document ST/SG/AC.10/C.3/2006/59 submitted by the expert from France. We are asking you to reconsider that action.
- (2) We would also refer you to ST/SG/AC.10/C.3/2006/81 recently submitted by DGAC and ICCR also suggesting a reconsideration.
- (3) As indicated in ISO 2248, part of the construction requirements called for in the drop test target area is a base whose mass is equivalent to 50 times the mass of the package to be dropped. In the case of some of our industries larger IBC's (including all metal, stainless steel, all plastic and composite IBC's) the mass of the target area would need to weigh approximately 400,000 lbs (200 metric tons). This would be the equivalent in size to a 40 foot ISO van filled with concrete and placed on end. Our research indicates that such a structure does not exist today at IBC manufacturer facilities nor at independent test labs.
- (4) A recent survey of the IBC manufacturers and some of the independent test labs in North America indicates that most of the target areas in use today consist of a base platform of two to three feet in depth of concrete which is then covered by a 1" steel plate. The variation in the concrete thickness depends upon the substrate that exists under the platform area. We believe that similar constructions exist in other areas of the world and can be readily built in the emerging nations.
- (5) As indicated in ICIBCA informal document UN/SCETG/29/INF.17, an evaluation of the 36 incidents that were reported in the USA during 2004 shows that there were no failures due to dropping of an IBC; such as falling off the rear of a van or toppling from a fork lift truck.
- (6) **Conclusion**
For the above reasons we request that the Sub-Committee reconsider the actions taken at the 29th session in regard to the proposal from France and we are in agreement with the DGAC/ICCR proposal that states "... prefer to maintain the existing text unchanged."