

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

Thirty-sixth session
Geneva, 30 November – 9 December 2009
Item 5 of the provisional agenda

MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments on ST/SG/AC.10/C.3/2009/37 (ICCP) Safe stacking load on IBCs
+ An additional proposal about a similar symbol on large packagings

Transmitted by the expert from Sweden

1. We believe that the provisions for a symbol that indicates the maximum stacking load are useful and improves safety. Sweden understands the intent of the proposal from ICCP, However, when considering safety, we are not convinced that the provisions should be amended. Firstly, it would be interesting to get information about the suitability to stack IBCs during storage. Even though the provisions for stacking derive from the transport regulations, the IBCs might be stored and then transported. Even if the provisions concerning stacking are fulfilled during transport the IBCs might collapse or burst if they have been stacked inappropriately during storage.
2. Nevertheless, if this Sub-Committee supports the view of ICCP, Sweden would like to suggest amending only the text in 6.5.2.2.2 and leaving the symbol as it is. The provisions for the symbol will enter into force in the specific transport regulations before any changes can be included in the UN Recommendations.
3. Furthermore, if a new symbol is adopted, we believe transitional measures should be included, since some manufactures would have started to use the existing symbol.

Additional proposal

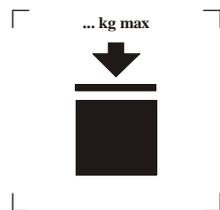
4. For large packagings in Chapter 6.6 there are no provisions for a symbol indicating the maximum stacking load. Large packagings which are designed to be stacked, shall undergo a stacking test according to 6.6.5.3.3. These large packagings which successfully pass this test are UN marked which includes the stacking test load in kgs in accordance with 6.6.3.1(g).
5. Sweden proposes to introduce the symbol for the maximum stacking load on large packagings. We are aware that it would be impractical to require this symbol to be applied to all existing large packagings. Therefore, there will be a need for a transitional period to allow

manufacturers to adjust to the new requirements. We suggest that these markings shall apply from the 1 January 2015. This will be a similar transitional period as for IBCs. We suggest that the existing symbol for IBCs is used, but if the symbol is changed in accordance with the proposal from ICCP, we would like to see this new symbol being used also for large packagings.

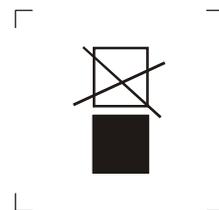
Proposal

6. Add a new 6.6.3.3 to read as follows:

“6.6.3.3 The maximum permitted stacking load applicable when the large packaging is in use shall be displayed on a symbol as follows:



Large packaging capable of being stacked



Large packaging NOT capable of being stacked

The symbol shall be not less than 100 mm × 100 mm, be durable and clearly visible. The letters and numbers indicating the mass shall be at least 12 mm high.

The mass marked above the symbol shall not exceed the load imposed during the design type test (see 6.6.5.3.3.4) divided by 1.8.

NOTE: *The provisions of 6.5.3.3 shall apply to all large packagings manufactured, repaired or remanufactured as from [1 January 2015].*”
