

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

20 November 2014

Forty-sixth session

Geneva, 1 – 9 December 2014

Item 2 (e) of the provisional agenda

Recommendations made by the Sub-Committee on its forty-third, forty-fourth and forty-fifth sessions and pending issues: miscellaneous pending issues

Comments on ST/SG/AC.10/C.3/2014/76 and informal document INF.6 Swedish proposals, regarding leakproofness testing procedures carried out before first use and during the periodic inspection for packagings and IBCs

Transmitted by the International Confederation of Container Reconditioners (ICCR)

1. ICCR represents companies reconditioning and remanufacturing industrial packagings, and routinely maintaining, remanufacturing, and repairing IBCs.
2. We agree with Sweden that a distinction must be drawn in the Model Regulations between design qualification testing and production testing.
3. We disagree, however, with eliminating all of the existing language and substituting only the term “suitable” testing. We support production testing, particularly for all of the performance standard packaging and IBCs covered by the Swedish proposals, but we are concerned that the term “suitable” could be misused to result in inadequate testing to identify leaks.
4. Now that the Swedish proposals affect all packagings and IBCs for liquids and solids discharged under pressure, we believe the subject has become too complex in its ramifications to resolve in the limited time available in last Sub-Committee session of the biennium.
5. Therefore, ICCR encourages the Sub-Committee not to adopt these proposals at this session but to carry them forward to the work schedule in the 2015-16 biennium.