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**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** **25 November 2014**

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

# Leakproofness testing procedures – comments on document ST/SG/AC.10/C.3/2014/76 and amended by UN/SCETG/46/INF.6 by the expert from Sweden

**Transmitted by the experts from Belgium and The Netherlands**

## Background

1. With the actual available production in-line verification equipments, the manufacturers of packaging and IBCs intended to be used for liquids typically cannot guarantee the requested leakproofness test level at 100%. They can only guarantee a certain detection level of leaks in function of their applied test methods, test pressures and test durations depending on for example properties of packagings and IBCs, and production rate. The in-line verification may not be called a suitable leakproofness verification, but should be considered as a part of the quality assurance verification which can additionally be a help to guarantee the leakproofness of packagings and IBC's intended to be used for liquids.

2 The Model Regulations provide in 6.1.1.4. for packagings and in 6.5.4.1 for IBC's, quality assurance programmes which have to satisfy the competent authority in order to ensure that all items comply with the relative requirements of packaging and IBC's. A note in those paragraphs is referring to an ISO standard, ISO 16106 which gives guidance on procedures which may be followed.

3. Bearing in mind the reality and the actual available detection methods in-line, as well as taking in mind that production speeds can vary from item to item (small bottles versus IBC's), an adequate verification system in production which is linked with a statistical sampling for verification of some tests as foreseen in chapter 6 could be a more efficient way forward. Therefore an alternative is proposed to adapt the paragraphs mentioned in document ST/SG/AC.10/C.3/2014/76 and amended by UN/SCETG/46/INF.6 by Sweden as follows ;

## Proposal

4. Amend the first paragraph in 4.1.1.12 to read:

> 4.1.1.12 Every packaging as specified in Chapter 6.1 intended to contain liquids shall successfully undergo a suitable leakproofness test as part of a QAP

(quality assurance program) as stipulated in 6.1.1.4 which shows the capability of meeting the appropiate test level indicated in 6.1.5.4.3 :

(a) Before it is first used for transport;

(b) After the remanufacturing or reconditioning of any packaging, before it is re-used for transport

The rest of the sub-section remains unchanged.

5. Amend the first paragraph in 6.1.1.3 to read:

6.1.1.3 Every packaging intended to contain liquids shall successfully undergo a suitable leakproofness test as part of a QAP (quality assurance program) as stipulated in 6.1.1.4 which shows the capability of meeting the appropiate test level indicated in 6.1.5.4.3 :

(a) Before it is first used for transport;

(b) After the remanufacturing or reconditioning of any packaging, before it is re-used for transport

The rest of the sub-section remains unchanged.

6. Amend the first paragraph in 6.5.4.4.2 to read:

"6.5.4.4.2 Every metal, rigid plastics and composite IBC for liquids, or for solids which are filled or discharged under pressure, shall undergo a suitable leakproofness test as part of a QAP (quality assurance program) as stipulated in 6.5.4.1 which shows the capability of meeting the appropiate test level indicated in 6.5.6.7.3:

(a) Before it is first used for transport;

(b) At intervals of not more than two and a half years."

The rest of the sub-section remains unchanged.