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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**

**Fifty-seventh session**

Geneva, 30 November - 8 December 2020
Item 6 (b) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods:
packagings**

 Alternative methods of testing of packagings - Consequential amendments resulting from ST/SG/AC.10/C.3/112, para. 80 and Annex I

 Transmitted by the experts from Belgium and Germany[[1]](#footnote-2)

 Revision

 Introduction

1. At the fifty-sixth session the Sub-Committee adopted an amendment to 6.5.1.1.2 based on ST/SG/AC.10/C.3/2019/5 and informal document INF.13 (fifty-sixth session). The amended text, regarding alternative service equipment, arrangements and methods of inspection and testing of Intermediate Bulk Container (IBCs) (see ST/SG/AC.10/C.3/112, para. 80 and Annex I) is as follows (relevant text is underlined):

“6.5.1.1.2 The requirements for IBCs in 6.5.3 are based on IBCs currently in use. In order to take into account progress in science and technology, there is no objection to the use of IBCs having specifications different from those in 6.5.3 and 6.5.5, provided that they are equally effective, acceptable to the competent authority and able to successfully fulfil the requirements described in 6.5.4 and 6.5.6. Methods of inspection and testing other than those described in these Regulations are acceptable, provided they are equivalent.”

2. As suggested by Germany, the wording “to successfully fulfil the requirements” could be used instead of “successfully to withstand the tests” in sub-sections 6.1.1.2, 6.3.2.1 and 6.6.1.3 to align the wording with sub-section 6.5.1.1.2 (see informal document INF.13 of the fifty-sixth session).

3. During the informal online session in July, there was general support for the three proposals given below. However, the International Council of Intermediate Bulk Container Associations (ICIBCA) and International Confederation of Container Reconditioners (ICCR) raised some concerns which should be addressed. ICIBCA referred to the already adopted text for IBC. While reviewing again the adopted wording, it was found that it seems to be beneficial – as suggested by the delegation of the Unites States of America during the fifty-sixth session – to remove the word “test” from “test requirement” in 6.5.1.1.2, because IBCs having specifications different from those in 6.5.3 and 6.5.5 shall meet all requirements described in 6.5.4 and 6.5.6, not only the test requirements. In proposals 4 to 6 below, the same principle as for IBCs is applied to packagings and large packagings, i.e. defining that packagings and large packagings having specifications different from those in 6.1.4, 6.3 and 6.6.4 shall meet all requirements in the sections on design type testing in 6.1.5, 6.3.5 and 6.6.5 and the requirements on the leakproof testing in 6.1.1.3 for packagings.

 Proposal

4. Amend 6.1.1.2 as follows (deleted text is ~~struck through~~; new text is underlined):

“6.1.1.2 The requirements for packagings in 6.1.4 are based on packagings currently used. In order to take into account progress in science and technology, there is no objection to the use of packagings having specifications different from those in 6.1.4, provided that they are equally effective, acceptable to the competent authority and able ~~successfully to withstand the tests~~ to successfully fulfil the requirements described in 6.1.1.3 and 6.1.5. Methods of testing other than those described in these Regulations are acceptable, provided they are equivalent.”

5. Amend 6.3.2.1 as follows (deleted text is ~~struck through~~; new text is underlined):

“6.3.2.1 The requirements for packagings in this section are based on packagings, as specified in 6.1.4, currently used. In order to take into account progress in science and technology, there is no objection to the use of packagings having specifications different from those in this Chapter provided that they are equally effective, acceptable to the competent authority and able ~~successfully to withstand the tests~~ to successfully fulfil the requirements described in 6.3.5. Methods of testing other than those described in these Regulations are acceptable provided they are equivalent.”

6. Amend 6.6.1.3 as follows (deleted text is ~~struck through~~; new text is underlined):

“6.6.1.3 The specific requirements for large packagings in 6.6.4 are based on large packagings currently used. In order to take into account progress in science and technology, there is no objection to the use of large packagings having specifications different from those in 6.6.4 provided they are equally effective, acceptable to the competent authority and able ~~successfully to withstand the tests~~ to successfully fulfil the requirements described in 6.6.5. Methods of testing other than those described in these Regulations are acceptable provided they are equivalent.”

1. 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2) [↑](#footnote-ref-2)