

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 6 (b) of the provisional agenda

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

Reviewing the definition of “Reused packaging” and “Reused large packaging” – follow-up to ST/SG/AC.10/C.3/2020/28

Transmitted by the experts from Belgium and Germany

Introduction

1. As mentioned in ST/SG/AC.10/C.3/112, para. 81, and proposed by Belgium amendments regarding the phrase “successfully fulfil the requirements” introduced in 6.5.1.1.2 during the fifty-sixth session (see also ST/SG/AC.10/C.3/2019/5 and informal document INF.13) should also be considered for some definitions in Chapter 1.2.
2. For the term “Reused packaging” the following amendment was proposed in ST/SG/AC.10/C.3/2020/28 (deleted text is ~~struck through~~; new text is underlined):

“Reused packaging means a packaging to be refilled which has been examined and found free of defects affecting the ability to ~~withstand the performance tests~~ successfully fulfil the requirements described in 6.1.1.3 and 6.1.5; the term includes those which are refilled with the same or similar compatible contents and are transported within distribution chains controlled by the consignor of the product;”
3. For the term “Reused large packaging” the following amendment was proposed in ST/SG/AC.10/C.3/2020/28 (deleted text is ~~struck through~~; new text is underlined):

“Reused large packaging means a large packaging to be refilled which has been examined and found free of defects affecting the ability to ~~withstand the performance tests~~ successfully fulfil the requirements described in 6.6.5; the term includes those which are refilled with the same or similar compatible contents and are transported within distribution chains controlled by the consignor of the product;”
4. During the informal online session in July, regarding the proposed text for reused packagings (given here in paragraph 2), other delegations pointed out that the reference to 6.1.1.3 is incorrect as there is no requirement that 6.1.1.3 is appropriate to a reused packaging.
5. In contrast to this position it was natural for Belgium and Germany to include 6.1.1.3 for packagings at the time of drafting ST/SG/AC.10/C.3/2020/28 because reused packagings still need to be leakproof, even though they do not need to be retested for that.
6. When drafting ST/SG/AC.10/C.3/2020/28, Belgium and Germany also discussed whether one should also refer to 6.1.4, because the Cobb test for 4G in 6.1.4.12.1 could also be interpreted as a performance test in Chapter 6.1. It was decided to exclude 6.1.4 from the proposal and to mention only 6.1.1.3 and 6.1.5. The same applies to the large packagings for which the Cobb test for 50G in 6.6.4.4.1 and the puncture resistance test for 50G in 6.6.4.4.2 could be interpreted as performance tests in Chapter 6.6.

7. The term “performance tests” is also used in different contexts in PP1 and PP14 (“performance tests in Chapter 6.1”) in 6.1.1.5, 6.3.2.3, 6.5.1.1.4 and 6.6.1.4 (“applicable performance tests of this Chapter”) referring to the whole chapter and not to specific paragraphs, in P621 and LP621 referring to the test conditions in Chapter 6.1 and 6.6 respectively (“retain liquids under the performance test conditions in Chapter” 6.1 and 6.6 respectively), note 2 of 6.1.3 (“those performance tests regulations that have been met”) and 6.1.3.13, 6.5.2.1.3, 6.6.3.4 (“relevant performance test requirements that have been met”); the term is also used in 6.4.2.14 and 6.4.15.6, but these are occurrences in relation to packages for radioactive material.

Continuation of work

8. Belgium and Germany would like to ask the Sub-Committee for their interpretation of the term “performance tests” currently used in the definitions of reused packaging and reused large packagings. There seems to be room for interpretation whether this term is related a) to the whole Chapters 6.1 and 6.6 respectively as indicated by other above-cited paragraphs or b) to the test requirements in sections 6.1.5 and 6.6.5 only.

9. Based on the outcome of the discussion, Belgium and Germany would like to present revised proposals in a future session.
