

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
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agenda item 5(b))

PACKAGINGS (INCLUDING IBCs AND LARGE PACKAGINGS)

Packaging

Rescind stacking test for flexible IBCs and flexible material large packaging

Transmitted by the Expert from China

Background

The purpose of performing the stacking test for flexible IBCs and flexible material large packaging is to examine if they can bear the pressure of stacking. We know that, for flexible IBCs and flexible material large packaging, it is the solid goods they packed rather than the packages themselves that act as a support while stacking. The packages bear only the outward tension transferred from the pressure of stacking, and this outward tension is for less than the tension produced in the drop test. In other words, the drop test of flexible IBCs and flexible material large packaging can replace the stacking test of them. Take woven plastics IBCs (13H) and large packaging (51H) as the examples: In China, we perform tests according to the Recommendations on the Transport of Dangerous Goods on every batch of woven plastics IBCs (13H) and large packaging (51H) for packaging export dangerous goods. We have performed nearly one thousand tests every year from 1985 till now. Non-conformities on stacking test were never found while there are often non-conformities found in the drop test. We are not talking about the quality of Chinese woven plastics IBCs (13H) and large packaging (51H) but that the stacking test could be totally replaced by the drop test because the natures of pressure the packages bear in the two circumstances are basically the same.

Moreover, different kinds of package bags (5L, 5H, 5M) are piling up during storage and transportation. We have not found any bags damaged due to the pressure from piling. For this reason, there is no demand on the stacking test of package bags (5L, 5H, 5M) in the Recommendations on the Transport of Dangerous Goods. Flexible IBCs and flexible material large packaging should be the same on this point with package bags (5L, 5H, 5M). So we propose to rescind the demand of the stacking test for flexible IBCs and flexible material large packaging.

Proposal 1

Modify the table in 6.5.4.3.5 as follows:

Before amendment:

Type of IBC	Bottom lift	Top lift a/	Stacking b/	Leak-proofness	Hydraulic pressure	Drop	Tear	Topple	Righting c/
Metai:11A,11B,11N	1st a/	2nd	3rd	-	-	4th e/	-	-	-
21A,21B,21N,31A,31B,31N	1st a/	2nd	3rd	4th	5th	6th e/	-	-	-
Flexible d/	-	x c/	x	-	-	x	x	x	x
Rigid Plastic:11H1,11H2, 21H1,21H2,31H1,31H2	1st a/	2nd	3rd	-	-	4th	-	-	-
	1st a/	2nd	3rd	4th	5th	6th	-	-	-
Composite:11HZ1,11HZ2, 21HZ1,21HZ2,31HZ1,31HZ2	1st a/	2nd	3rd	-	-	4th e/	-	-	-
	1st a/	2nd	3rd	4th	5th	6th e/	-	-	-
Fibreboard	1st	-	2nd	-	-	3rd	-	-	-
Wooden	1st	-	2nd	-	-	3rd	-	-	-

After amendment:

Type of IBC	Bottom lift	Top lift a/	Stacking b/	Leak-proofness	Hydraulic pressure	Drop	Tear	Topple	Righting c/
Metai:11A,11B,11N	1st a/	2nd	3rd	-	-	4th e/	-	-	-
21A,21B,21N,31A,31B,31N	1st a/	2nd	3rd	4th	5th	6th e/	-	-	-
Flexible d/	-	x c/	-	-	-	x	x	x	x
Rigid Plastic:11H1,11H2, 21H1,21H2,31H1,31H2	1st a/	2nd	3rd	-	-	4th	-	-	-
	1st a/	2nd	3rd	4th	5th	6th	-	-	-
Composite:11HZ1,11HZ2, 21HZ1,21HZ2,31HZ1,31HZ2	1st a/	2nd	3rd	-	-	4th e/	-	-	-
	1st a/	2nd	3rd	4th	5th	6th e/	-	-	-
Fibreboard	1st	-	2nd	-	-	3rd	-	-	-
Wooden	1st	-	2nd	-	-	3rd	-	-	-

Proposal 2

Before amendment:

Applicability

For all types of IBC which are designed to be stacked on each other, as a design type test.

After amendment:

Applicability

For all types of IBCs other than flexible IBCs which are designed to be stacked on each other, as a design type test.

Proposal 3

Before amendment:

Applicability

For all types of large packaging which are designed to be stacked on each other, as a design type test.

After amendment:

Applicability

For all types of large packaging other than flexible material large packaging which are designed to be stacked on each other, as a design type test.
