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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

<u>Sub-Committee of Experts on the</u> <u>Transport of Dangerous Goods</u> (Twenty-first session, 1-10 July 2002 agenda item 6)

PACKAGINGS

Puncture test proposal (ST/SG/AC.10/C.3/2002/4)

Transmitted by the International Confederation of Drum Manufacturers (ICDM)

The justification for a puncture test has not been demonstrated by one accident with one steel drum in Alicante. Furthermore there has been no evidence supplied that the accident was due either, to inadequate specifications of the drum, or, to inappropriate handling and transport conditions.

The UN Model Regulations cannot cover all eventualities concerning the inadvertent movements of cranes and forklift trucks. It must be reiterated that the original four primary performance tests were devised on the basis of individual packagings withstanding normal conditions of transport.

It is therefore considered premature for a study to be undertaken to institute a puncture test until adequate justification has been provided on the extent of leakage due to puncture covering all types of packagings under normal conditions of transport.

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