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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

17 June 2011

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Geneva, 20–24 June 2011 Item 8 of the provisional agenda

Global harmonization of transport of dangerous goods regulations with the Model Regulations

Outcome of the Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods on its Autumn 2010 session

Note by the secretariat

- 1. During the Autumn 2010 session of the Joint Meeting, some issues were raised and the secretariat was invited to bring them to the attention of the Sub-Committee for resolution or advice.
- 2. Relevant paragraphs of the report are reproduced as annex to this informal document.

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Annex

Waste lithium batteries

Document: ECE/TRANS/WP.15/AC.1/2010/50 (United Kingdom)

22. The majority of the delegations considered that the English term "tray" and the French term "bac", used in packing instruction P903 (b), meant a rigid, solid box without lid. This concept could be clarified as part of the work of the United Nations Sub-Committee of Experts, which was currently dealing with the matter.

Test samples for the vibration test of IBCs

Informal document: INF.17 (EuPC)

- 24. RID and ADR reproduced paragraph 6.5.6.3.3 of the UN Model Regulations, according to which, in order to prove the chemical compatibility of rigid plastics or composite IBCs with dangerous goods, samples of the IBCs to be tested could be subjected to preliminary test storage of six months holding the substance they are supposed to contain or an equivalent substance. Afterwards, the IBCs were to be submitted to all the design type tests provided under 6.5.6.3.7, including the vibration test, which, like the drop test, could be carried out on a separate IBC of the same model.
- 25. That method was given as an example. However, in accordance with 6.5.6.3.4 of the UN Model Regulations, RID and ADR provided an alternative method for testing the chemical compatibility of rigid polyethylene IBCs or of composite IBCs containing inner receptacles in polyethylene. That entailed a preliminary storage period of three weeks instead of six months, with the use of an appropriate reference liquid. The EuPC representative noted that RID and ADR (para. 6.5.6.3.5) did not provide for that three-week preliminary storage period for samples submitted for the vibration test; the period was required only for the other tests. He therefore expressed the wish that the preliminary storage period prior to the vibration test, i.e., storage of six months with the substance the IBC is intended to contain, should not be required when the UN Model Regulations method was used.
- 26. Opinions differed. Some delegations considered that preliminary storage should be required no matter what method was used to verify the chemical compatibility, otherwise the equivalence of the alternative method with the one recommended by the UN Model Regulations could not be guaranteed. Others considered that the decision in question had been taken intentionally, and that it was for the Contracting Parties to determine how to verify the chemical compatibility in conformity with 6.5.6.3.2 and 6.5.6.3.4 of the Model Regulations.
- 27. It was agreed to bring to the attention of the United Nations Sub-Committee of Experts the question of whether it would be acceptable if IBC samples used for vibration tests were not subjected to preliminary storage in order to verify chemical compatibility.

Additional text on danger labels

Document: ECE/TRANS/WP.15/AC.1/2010/34 (Austria)

Informal document: INF.25 (Switzerland)

33. The Joint Meeting noted that the various language versions of 5.2.2.2.1.5 were not very clearly worded in respect of the information that may or may not be optionally inserted in the lower portion of the danger label. However, since that text was from the UN Model Regulations, the issue should preferably be brought to the attention of the United Nations Sub-Committee of Experts with a view to determining, in particular, whether the UN number should be displayed either alone or after the letters "UN". In the latter case, it should be determined whether it was also necessary to mark the UN number after the letters "UN" on the package itself.