

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  
(Nineteenth session, 2-6 July 2001  
agenda item 5(a))

Packagings

Performance Testing

Transmitted by the Expert from Canada

1. ISO is preparing standards for packagings and IBCs that are intended to complement the requirements in the Model Regulations and to promote the standardization of practices used in testing and manufacturing packagings and IBCs. Canada supports this work.
2. The expert from Canada is concerned with the differences that exist between ISO/EN16104 and the Model Regulations and with some of the proposals in ST/SG/AC.10/C.3/2001/24. The Canadian representative to the ISO working group considering the ISO standards on packagings and IBCs has stated those concerns to the working group.
3. **PROPOSALS FOR ADOPTION, ST/SG/AC.10/C.3/2001/24**

**Proposal 1: Preparation of packagings for testing**

We agree that it is difficult to precisely measure the 95% level in flexible packaging, however, we think that the wording in the proposal is inadequate because it would permit a bag to be tested partially filled. The Sub-Committee may wish to consider revising both the bag and FIBC requirements in the Model Regulations. For example, after the second sentence in 6.1.5.2.1 add "For bags, 95% of capacity may be approximated." In 6.5.4.6.2, 6.5.4.9.2(b), 6.5.4.10.2, 6.5.4.11.2 and 6.5.4.12.2 add "For Flexible IBCs, 95% of capacity may be approximated."

**Proposal 2: Drop test**

The expert from Canada does not support this proposal. If gasket relaxation was the cause of the incidents referred to in the proposal and is a serious safety concern warranting a change to

the test method then the Sub-Committee should be provided with test reports and other available justification on which to base a decision for such a change.

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### **Proposal 3: Anti-freeze mixtures for cold drop tests**

The expert from Canada does not believe that the addition of the proposed note is necessary in that 6.1.5.3.2 of the Model Regulations provides for the use of a water/anti-freeze mixture.

### **Proposal 4: Cooperage Test**

The expert from Canada supports this proposal.

## 4. **POINTS FOR CONSIDERATION**

### **6.1.5.1 Performance and frequency of tests (Design types)**

The expert from Canada supports the proposed amendment.

#### **6.1.5.3.4 Adjustment of the drop height**

The expert from Canada supports the proposed amendment.

### **Partially filled packaging**

The expert from Canada believes that the Sub-Committee should be provided with test reports and any other available justification before it considers the proposed amendment.

5. In addition to some of the differences mentioned in the proposal there are other technical differences that exist between ISO/EN16104 and the Model Regulations including a reference to light gauge metal packaging, a reference to ISO 17025 for a quality assurance system rather than the competent authority and the exclusion of the water resistance test for fibreboard. The Sub-Committee needs to consider its response to the differences between this ISO standard and the Model Regulations. The expert from Canada believes that changes to the packaging test requirements in the Model Regulations should be undertaken by the Sub-Committee if the changes are needed and can be justified by relevant documentation.
6. The expert from Canada does not support replacing the packaging test requirements in the Model Regulations with a reference to an ISO standard. However, as stated above, Canada does support a standard that would complement the Model Regulations. Given the status of the Model Regulations with national authorities and other UN bodies such as ICAO and IMO, the expert from Canada believes that the Sub-Committee must continue to have control over the development of the requirements in the Model Regulations.