

**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**
(Twenty-second session, 2-6 December 2002,
agenda item 4 (a))

NEW PROPOSALS

OUTSTANDING ISSUES

Comments on ST/SG/AC.10/C.3/2002/77

Transmitted by the European Council of Paint, Printing Ink and Artists' Colours Industry (CEPE)

Vibration Test

When the UN Sub-Committee of Experts on the Transport of Dangerous Goods in their July 2002 meeting discussed the vibration test there was just one test method in the focus which is the "Repetitive Shock Test" proposed by the USA.

The Sub-Committee meeting in December 1999, however, had decided "that, in principle at some time in the future, a vibration test should be included in the Model Regulations, on the understanding that the forms the test would take and the criteria for it were still to be defined and should take account of pertinent ISO standards and existing vibration standards".

If a vibration test is really needed (which has not been proven yet – in our experience the small number of failures of UN containers that have occurred were due to incorrect loading or stacking, not vibration) it should be carefully investigated at ISO level which of the test methods already being elaborated by ISO or still dealt with in ISO Working Groups are the most realistic in order to be applied. The "Repetitive Shock Test" proposed by the USA in their paper 2002/77 in our view is not representative of real transport impacts. Instead of shocks of one low frequency, a random vibration test could be much more realistic and such a test could also fulfil exactly the above mentioned decision made in December 1999.

Before making hasty, unbalanced and one-sided decisions on the test method we request the Sub-Committee to set up a Working Group in order to find out if a vibration test is really needed and, if that is the case, to establish test methods that are realistic and in line with conditions actually experienced during transportation.
