

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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INFECTIOUS SUBSTANCES

Observation on the consistency of packaging requirements in Chapter 6.3 with related requirements in Chapters 6.1, 6.5 and 6.6

Transmitted by the International Standards Organization (ISO)

Background

Having completed its first packaging test standard¹, which is ready for publication and having prepared the public inquiry on the second standard for IBCs², ISO has decided to prepare similar standards also for the testing of large packaging and packaging for infectious substances.

All of these standards are directly related to the provisions of the UN Model Regulations and are deemed to support its application.

The preparation of these standards is based on a careful reading of the UN text and has already led to some observations and proposals for amendments by ISO (see ST/SG/AC.10/C.3/2001/24). Most of the parties carrying these standard projects are notified in their countries in Europe and northern America for the performance of design type testing and approval and aware of the reasoning behind the UN Model Regulations and equipped with test experiences of many years.

Information

This is to inform, that, as a result of the preparatory work on the draft standard on the design type testing of packagings for infectious substances, major differences between Chapter 6.3 on one side and Chapters 6.1, 6.5 and 6.6 have been identified, for which no reasoning or justification could be found.

Such differences are, among others related to

- the scope and application of the specific packaging requirements, including the option of “W”-marked types,
- the need to demonstrate leakproofness for every packaging,
- the application of a quality assurance programme for the manufacture of packagings,
- the consistent use of terms,
- the application of packagings tests on design types including the rights of competent authorities to ask for a repetition of tests or to permit selective testing.

It is also noted that some provisions in Packing Instructions 620 and 650 may be more related to packaging and to performance testing than related to packing duties and may better be found under the responsibilities of packaging manufacturers in Part 6.

At this point of time, it's the intention of ISO to announce a further document in due time with detailed findings and proposals.

To the estimation of ISO, a review of the packaging provisions will not interfere with the results of the revision work on the classification and packing of infectious substances.

¹ EN ISO 16104 Packaging – Transport packages for dangerous goods – Test methods for packaging

² prEN ISO 16467 Packaging – Transport packages for dangerous goods – Test methods for IBCs