

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-fourth session
Geneva, 3-10 December 2003
Item 4(b) of the provisional agenda

PACKAGINGS

Performance testing

Comments on document ST/SG/AC.10/C.3/2003/44 (from Spain)

Transmitted by the European Secretariat of Manufacturers of Light Metal Packaging
(SEFEL)

With this proposal, Spain is again proposing a new test, which is being derived from “some puncture tests” based on an experimental basis which are not reflecting the realistic and normal conditions of transport. Especially “nails placed on the floor or in pallets” do not describe these usual conditions.

On occasion of the 21st meeting of the Sub-Committee of Experts on the Transport of Dangerous Goods (1-10 July 2002) it was already pointed out that existing tests were intended to ensure safety under normal conditions of carriage, and that problems of perforation tended to be accidental occurrences during carriage or handling.

Besides the experts from Spain were asked at this meeting to provide statistical data of incidents raised to justify such a puncture test, especially in view of the additional cost which the requirement of a puncture test would entail and the practical consequences for packagings already approved or in service. The tabled document ST/SG/AC.10/C.3/2003/44 does not include the data requested. In this context we would like to point out that it has not been illustrated until now what damage resulted at all to the drum in question in the earlier mentioned one single case (port of Alicante). It would generally appear impossible to design packaging means economically in such a way that they will withstand any and all eventualities, like, e. g., destruction by fork lifts.

With regard to the proposed test procedure (ST/SG/AC.10/C.3/2003/44, para. 3) we can not comment on these as far as the usefulness of such a puncture test was discussed by the UN SC Experts on the Transport of Dangerous Goods in total.

At least we would like to ask the UN SC Experts on the Transport of Dangerous Goods to stick to the general understanding as entered in the minutes of the last meeting in December that any new proposal to change the well-tried United Nations requirements shall be justified by problems clearly identified and listed.

As a consequence we are not in favour to support the proposed test and we ask for consideration of our arguments.
