

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 (a) of the provisional agenda

PACKAGINGS (INCLUDING IBCs AND LARGE PACKAGINGS)

Miscellaneous proposals

Comments on ST/SG/AC.10/C.3/2003/57, UN/SCETDG/24/INF. 21 (The Netherlands) and UN/SCETDG/24/INF. 16 (Canada)

Transmitted by the expert from the United Kingdom

Introduction

1. The expert from the United Kingdom welcomes the efforts of the expert from the Netherlands to highlight issues to be resolved by a possible inter-sessional Working Group in the context of package testing, set out in UN/SCETDG/24/INF.21. The proposals in the United Kingdom document ST/SG/AC.10/C.3/2003/37, which addresses matters arising from the adoption of ISO Standard 16104 should also be noted. This would seem, at least in part, to accord with the views of the Dutch expert in paragraph 3 of UN/SCETDG/24/INF.21. However, we also note the continuing concern of some experts in respect of referencing parts of a testing Standard in the Model Regulations viz. UN/SCETDG/24/INF.16 submitted by the expert from Canada. However, ISO Standard 16104 has been adopted in accordance with agreed procedures and the Sub-Committee should now take some account of it.
2. Debate in the Sub-Committee on these matters has revealed a number of issues with the existing text in the Model Regulations and the United Kingdom thus supports the proposal for an inter-sessional Working Group. However, it seems likely that the participants in such a Working Group would be drawn largely from competent authority appointed test houses or major packaging manufacturers who are the principal users of the package testing text and not general users of the Model Regulations. This reflects the specialist nature of the testing provisions text.
3. The expert from the United Kingdom believes that the Sub-Committee should take this opportunity to take a wider view and give the Working Group an appropriate mandate. In addition to the suggestions given in the Annex to INF.21, the Working Group should be asked to consider removing the bulk of the testing provisions in Chapters 6.1, 6.3, 6.4, 6.5 and 6.6 from the Model Regulations and placing them instead in a new Part 4 of the Manual of Tests and Criteria. A small rump of text, setting out the legal requirements for testing would remain in Part 6 of the Model Regulations (or possibly be added to Part 4) whilst specialist text would be separated. This would have the advantage of consolidating test material in the Manual, where experience of holding many training courses suggests the logic of users of the Model Regulations would expect it to be. It would retain ownership of the test regimes firmly with the Sub-Committee. It would also have the advantage of removing some 75 pages of specialist text from the Model Regulations.

4. The expert from the United Kingdom has already applied this approach informally to Chapter 6.1 to ensure that it would work satisfactorily and would thus be happy to make this available to the proposed Working Group as a starting point.
 5. The views of the Sub-Committee are invited.
-