UNITED NATIONS **ST**

Secretariat

Distr.
GENERAL

ST/SG/AC.10/C.3/2006/14
3 April 2006

Original: ENGLISH

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-ninth session
Geneva, 3-12 (a.m.) July 2006
Item 4 of the provisional agenda

PACKAGINGS (INCLUDING IBC'S AND LARGE PACKAGINGS

Reference to standard ISO 16106

Submitted by the expert from Germany

Introduction

1. The Subcommittee was repeatedly given the opportunity to become acquainted with the effort by CEN and ISO to establish guidelines for the application of standard ISO 9001 in context of the manufacture of type-approved packagings, IBCs and large packagings. These guidelines were deemed to complement the requirements in paragraphs 6.1.1.4, 6.5.4.1 and 6.6.1.2 of the UN Model Regulations asking for the application of a quality assurance programme which satisfies the competent authority and have now been approved by CEN and ISO. Its title is

> *EN ISO 16106: 2006 – Packaging – Transport packages for dangerous goods – Dangerous goods packagings, intermediate bulk containers (IBCs) and large packagings – Guidelines for the application of EN ISO 9001.*

2. At the twenty-third session of the Sub-Committee, ISO invited experts of the Sub-Committee to take part in a conference on this subject on 4 July 2003, where detailed information and several national views were provided (see UN/SCETDG/23/INF.8).

3. At the twenty-fourth session, notes on this conference (UN/SCETDG/24/INF.36) and an invitation to comment on the draft guidelines through the national ISO or CEN member bodies (UN/SCETDG/23/INF.55) were presented.

4. In July 2004, a full copy of the draft text, as prepared for the parallel voting by ISO and CEN was distributed (UN/SCETDG/25/INF.3) and the concerns by ICDM were addressed (see ECE/TRANS/WP.15/AC.1/102, para. 23).

5. During a meeting at the end of September 2004, the CEN ISO working group in charge of this project dealt with all comments as result of the parallel vote. The final draft was then subjected to the final parallel vote between 1 December 2005 and 1 February 2006. The document was approved by both CEN and ISO members and is now being prepared for printing.

6. During its session held from 20 to 23 March 2006, the Joint Meeting of the RID Safety Committee and the UNECE Working Party on the Transport of Dangerous Goods adopted the standard and agreed upon appropriate references in the ADR and the RID (see para 60 of the report, ECE/TRANS/WP.15/AC.1/2006/CRP.1).

Proposal

7. It is proposed to refer to EN ISO 16106 in paragraphs 6.1.1.4, 6.3.2.2 (text as agreed during the 28th session), 6.5.4.1 and 6.6.1.2 of the UN Model Regulations, as follows:

6.1.1.4 Packagings shall be manufactured, reconditioned and tested under a quality assurance programme which satisfies the competent authority in order to ensure that each packaging meets the requirements of this Chapter.

Quality assurance programmes established in accordance with EN ISO 16106: 2006 Packaging –Transport packages for dangerous goods – Dangerous goods packagings, intermediate bulk containers (IBCs) and large packagings – Guidelines for the application of EN ISO 9001 - shall be considered as satisfactory.

6.3.2.2 Packagings shall be manufactured and tested under a quality assurance programme which satisfies the competent authority in order to ensure that each packaging meets the requirements of this Chapter.

Quality assurance programmes established in accordance with EN ISO 16106: 2006 Packaging –Transport packages for dangerous goods – Dangerous goods packagings, intermediate bulk containers (IBCs) and large packagings – Guidelines for the application of EN ISO 9001 - shall be considered as satisfactory.

6.5.4.1 Quality assurance: the IBC shall be manufactured and tested under a quality assurance programme which satisfies the competent authority in order to ensure that each IBC meets the requirements of this Chapter.

Quality assurance programmes established in accordance with EN ISO 16106: 2006 Packaging –Transport packages for dangerous goods – Dangerous goods packagings, intermediate bulk containers (IBCs) and large packagings – Guidelines for the application of EN ISO 9001 - shall be considered as satisfactory.

6.6.1.2 Large packagings shall be manufactured, reconditioned and tested under a quality assurance programme which satisfies the competent authority in order to ensure that each packaging meets the requirements of this Chapter.

Quality assurance programmes established in accordance with EN ISO 16106: 2006 Packaging –Transport packages for dangerous goods – Dangerous goods packagings, intermediate bulk containers (IBCs) and large packagings – Guidelines for the application of EN ISO 9001 - shall be considered as satisfactory.

Justification

8. The guidelines justify their existence by the following (excerpt from introduction):

(a) The wording of the legal requirements is restricted to the basic need, that there should be a quality assurance programme that satisfies the competent authority and is open to different interpretation;

(b) The items of concern to be assured with respect to their quality (dangerous goods packagings, IBCs and large packagings) are subject to legal requirements. The conformity of any manufactured item to the relevant provisions is based on the principle of official design type testing and approval, which requires that specific measures are applied in order to secure the conformity of any of the unlimited number of items to the requirements of an approved design;

(c) In view of the cost implications of quality assurance/ quality management measures, complete freedom of interpretation could have an avoidable negative impact on competition;

(d) The establishment of quality assurance/ management measures is, particularly for smaller companies, a heavy burden and calls for further guidance;

(e) Interactions between companies and competent authorities on the adequacy of QA/QM programmes need to be rationalised and unnecessary effort reduced to a minimum.
