

## 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

Thirty-third session  
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Item 3 of the provisional agenda

### PERFORMANCE OF PACKAGINGS, INCLUDING IBCs

#### Comments on ST/SG/AC.10/C.3/2008/45 of Germany

#### Transmitted by the Expert from Canada

1. The Expert from Canada has reviewed the subject paper from Germany on through-wall permeation in relation to plastic packaging, including IBCs. We have also reviewed INF 28 by the Expert from the Netherlands.
2. The Expert from Canada agrees with most of the comments expressed by the Netherlands in INF 28. The Expert from Canada believes that a consignor of dangerous goods should be appropriately cautioned in the Model Regulations as to the potential hazard of permeation.
3. The Expert from Canada believes that potential permeation of dangerous goods through a container wall is, in principle, an issue of the compatibility of a container with the dangerous goods. The appropriate place in the Model Regulations to address such an issue is in the “use” provisions in Chapter 4.1, which places the responsibility for compliance on the person selecting the packaging.
4. The Expert from Canada does not agree that provisions addressing permeation are appropriately placed in Part 6 of the Model Regulations since these provisions apply to a manufacturer of containers who, in principle, is not in a position to control the selection of a container for particular dangerous goods.
5. The Expert from Canada does not agree that permeation through a container wall that could cause a danger should be viewed as conditionally acceptable as seems to be implied in ST/SG/AC.10/C.3/2008/45. Any notations on transport documents, ventilation or markings on transport units would not, in our view, compensate for such a danger. Similarly, we do not believe that routine venting from a container or IBC in transport is acceptable. Consequently,

the Expert from Canada does not agree with Note 1 to 4.1.1.1 in ST/SG/AC.10/C.3/2008/45 and does not agree with the proposed text of 5.5.3 nor with the proposed mark in Figure 5.5.2.

6. The Expert from Canada does not agree Note 2 to 4.1.1.1 in ST/SG/AC.10/C.3/2008/45 and further questions the proposed reference in it to unspecified “technical means applied to packagings” and “cool conditions”.

**Proposal**

Instead of the changes to the Model Regulations proposed by Germany in ST/SG/AC.10/C.3/2008/45, the Expert from Canada, proposes adding paragraph (c) to 4.1.1.2. The text of the proposed paragraph reads as follows:

- (c) “Shall not allow permeation of the dangerous goods that could constitute a danger under normal conditions of transport.”

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