

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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Item 6 (g) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: packagings

Leakproofness testing of packagings and IBCs: Comments on document –2013/11 (Sweden)

Transmitted by the International Confederation of Plastics Packaging Manufacturers (ICPP)

1. With document ST/SG/AC.10/C.3/2013/11 the expert from Sweden points out differences between the text of the Model Regulations and practised experience especially in mass productions of packagings and IBCs and asks how these differences are managed by the various countries. ICPP welcomes the paper because the industry is interested in both a high safety level and legal certainty.
2. ICPP points out that there are no safety problems regarding the leakproofness of packagings and IBCs for liquids on the market. That means that the current practice of leakproofness testing during production of packagings and IBCs seems to be sufficient.
3. ICPP wishes to underline that the questions raised are relevant for all types of packagings and IBCs for liquids manufactured in mass production and not only for IBCs as expressed in the headline of document –2013/11.
4. For a structured discussion of the issue described in document –2013/11, ICPP suggests to make a clear distinction between:
 - mass production of packagings and IBCs for liquids; and
 - the two and a half year inspection of IBCs.
5. For the mass production of packagings and IBCs several competent authorities in Europe and America gave special approvals to the industry to carry out the leakproofness test differing from the design type test requirements in 6.1.5.4. and 6.5.6.7.3 of the Model Regulations. Often these approvals are combined with the obligation to run statistical tests under conditions of the design type test.
6. For the two and a half year inspection of IBCs, ICPP considers that the provisions in 6.5.4.4 have proven effective and do not require adaptation.
7. ICPP offers its support to address the items highlighted by the expert from Sweden in an appropriate manner and is prepared to bring into the discussion know-how and experience of the industry.