
**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

21 November 2018

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-fourth session

Geneva, 26 November-4 December 2018

Item 2 (f) of the provisional agenda

**Recommendations made by the Sub-Committee on its fifty-first,
fifty-second and fifty-third sessions and pending issues:
miscellaneous pending issues**

**Comments on ST/SG/AC.10/C.3/2018/74 from Germany
concerning multiple markings of packagings, including IBCs
and large packaging, indicating conformity with more than
one successfully tested design type**

**Transmitted by International Confederation of Container
Reconditioners (ICCR)**

Introduction

1. As the expert from Germany points out in document ST/SG/AC.10/C.3/2018/74, during the fifty-third session, the Sub-Committee adopted new text allowing the use of multiple marks on packagings, including IBCs and large packagings. These marks indicate conformity with more than one design type.
2. The expert from Germany appears to be concerned that a packaging filler may not be able to easily determine which closure instruction is associated with a given mark on a packaging bearing multiple marks.
3. The proposed solution would revise the fourth sentence of paragraph 5.4.1.5.1 by deleting the current requirement that shippers indicate on the dangerous goods transport document the "... number and kind (e.g. drum, box, etc.) ..." of packages carrying dangerous goods, and substituting language indicating the "design type" of the packagings.
4. ICCR believes Germany's proposal to delete the word "kind" from 5.4.1.5.1 would create problems for shippers because the phrase "design type", which is defined in 6.1.5.1.2, is broad and, particularly for large packagings and IBCs, only fully understood if the test report is available. Since test reports are retained by the packaging manufacturer and the test facility, they are not readily or commonly available to the individual responsible for completing a transport document. As such, it would be nearly impossible for a shipper to know with certainty that a specific packaging conforms to a specific design type. Nor is this even necessary since a shipper is permitted to rely upon the mark as certification by the packaging manufacturer (or distributor) that the packaging conforms to a tested design type.
5. ICCR believes that 5.4.1.5.1 was purposefully drafted to correspond to 6.1.2.1, which authorizes the use of an Arabic numeral to describe the "kind of packaging, e.g. drum, jerrycan, etc." The word "kind" also appears in the Table in 6.1.2.7.
6. ICCR believes that enforcement personnel simply want to know how many of each "kind" of packaging (e.g. drum, IBC, etc.) in a transport vehicle contain dangerous goods. To this end, we urge the Sub-Committee to retain paragraph 5.4.1.5.1 in its current form.