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

15 November 2019

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-sixth session

Geneva, 4-10 December 2019

Item 6 (b) of the provisional agenda

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

Alternative service equipment, arrangements and methods of inspection and testing of IBCs - Justification for the wording in the proposal in ST/SG/AC.10/C.3/2019/5

Transmitted by the expert from Germany

Introduction

1. Within the framework of the fifty-fifth session, the proposal in ST/SG/AC.10/C.3/2019/5 was adopted; however, a part of the text was amended as proposed by Belgium and the USA and put in square brackets as proposed by Germany (see ST/SG/AC.10/C.3/110, p. 25).
2. The background of the proposal by Belgium was that the wording “to withstand the tests” as used in 6.1.1.2, 6.3.2.1 and 6.6.1.3 should also be used for IBCs in 6.5.1.1.2.
3. The original proposal by Germany read as follows: “to fulfil the test requirements”. This wording was chosen deliberately, as for IBCs alternative methods should be acceptable not only for tests but also for inspections (see no. 7 in ST/SG/AC.10/C.3/2019/5).
4. “To fulfil the test requirements” was proposed, as in 6.5.4.2 the definition of the term “test requirements” includes inspections. With the wording “to withstand the tests”, by contrast, it remains unclear whether this also includes inspections.

Proposal

5. It is suggested that the original proposal in ST/SG/AC.10/C.3/2019/5 be used, which reads as follows:

“The requirements for IBCs in 6.5.3 are based on IBCs currently in use. In order to take into account progress in science and technology, there is no objection to the use of IBCs having specifications different from those in 6.5.3 and 6.5.5, provided that they are equally effective, acceptable to the competent authority and able to successfully fulfil the test requirements described in 6.5.4 and 6.5.6. Methods of inspection and testing other than those described in these Regulations are acceptable, provided they are equivalent.”

Additional comment

6. If it is desired to approximate the sub-sections 6.1.1.2, 6.3.2.1, 6.5.1.1.2 and 6.6.1.3, the wording “to fulfil the test requirements” could be used instead of “to withstand the tests” also in 6.1.1.2, 6.3.2.1 and 6.6.1.3, as “test requirements” is contained in the headings of 6.1.5, 6.3.5 and 6.6.5, and in 6.1.1.3 test requirements are described even if the term “test requirements” is not used.
