

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

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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 6 (b) of the provisional agenda

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

Comment on ST/SG/AC.10/C.3/2021/51 – Supplementary note in 6.1.5.3.4 on the target in the drop test for packagings

**Submitted by the International Confederation of Container
Reconditioners (ICCR), International Confederation of Drums
Manufacturers (ICDM), International Confederation of Intermediate
Bulk Container Associations (ICIBCA) and International
Confederation of Plastics Packaging Manufacturers (ICPP)**

Introduction

1. At its twenty-ninth session, the Sub-Committee adopted amendments (see ST/SG/AC.10/C.3/58/Add.1, Annex 1, paragraphs 6.1.5.3.4, 6.3.5.3.1, 6.5.6.9.3, and 6.6.5.3.4.3) to requirements for the target in the drop tests for packagings, packagings for infectious substances, IBCs, and large packagings based on documents ST/SG/AC.10/C.3/2006/59 and UN/SCETDG/29/INF.61 both submitted by France.
2. But at its thirtieth session, the Sub-Committee undertook a renewed discussion, because the new provisions adopted by the Sub-Committee (at its twenty-ninth session) for paragraphs 6.1.5.3.4, 6.3.5.3.1, 6.5.6.9.3 and 6.6.5.3.4.3 would have posed problems, since the target mass at many test laboratories did not meet the specifications of ISO 2248, notably for testing IBCs and large packagings (see ST/SG/AC.10/C.3/60, page 7).
3. At that time, it was also noted that the standard in question was to be revised and that it might be premature to introduce precise requirements if the specifications for drop targets were to be amended in the near future. The standard has not been revised to date, so that the advice made at that time is still valid.
4. Therefore, at its thirtieth session, the *“Sub-Committee ultimately decided to introduce in the regulations a text that reproduced only the performance requirements, without actually quantifying them at the current time, on the basis of the proposal made by the expert from France (INF.68) (see annex). Those requirements could be specified subsequently, for example in the light of the work undertaken by ISO.”* (see ST/SG/AC.10/C.3/60, page 7).

Discussion

5. In the light of the above-mentioned earlier consultations on the topic “drop test target”, the authors of this informal document have also looked at the document “Supplementary note in 6.1.5.3.4 on the target in the drop test for packagings” (ST/SG/AC.10/C.3/2021/51) of the Chinese experts.
6. Of course, when the drop test is carried out, the target is a key part. However, the arguments presented by the Chinese experts in ST/SG/AC.10/C.3/2021/51 for the necessity of a revision of the requirements do not lead to any new insights compared to the discussion and decision already made in 2006.

7. As a note in ISO 2248, the target surface provision is not a requirement. While providing guidance on criteria for a target surface, it allows for flexibility when strict compliance with the criteria may be impracticable.

8. If, on the other hand, the note proposed by China is to be included in the requirements, this could suggest that this is mandatory.

Proposal

9. The authors of this informal document question the actual safety benefit provided by the Chinese experts in ST/SG/AC.10/C.3/2021/51 and would prefer to maintain the existing text unchanged.
