



Secretariat

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**COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS****Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Fifteenth session,
Geneva, 29 June-10 July 1998)**PACKAGINGS AND IBCs****Alternatives to the water bath test****Comments on ST/SG/AC.10/C.3/1997/79****Transmitted by the European Aerosol Federation (FEA)**

During the 14th session in December, Germany presented a paper on the leakproofness for aerosols and small receptacles for gas (ST/SG/AC.10/C.3/1997/79). FEA supports the principle of alternatives to the water bath. Whilst the water bath test has been in use for over 40 years in Europe, there have been no accidents that we know of, caused by manufacturing faults in aerosol cans. This is giving the industry a safety record second to none. However, FEA recognises that aerosol can technology has developed and there is now a need to identify alternative methods providing the same level of quality and safety can be maintained.

FEA has had a working group studying alternatives to the water bath test for the past 2 ½ years. They expect to complete their work and undertake some trials during the next two years. This will be based upon experience of production trials being carried out by several European companies over recent years. To maintain the same level of confidence, the work is being developed carefully. FEA is also consulting the aerosol industry outside Europe.

The proposal by the German expert addresses many of the issues that FEA has been considering but it does not go as far as we would wish. The current water bath test is a 100% test and reveals seam and valve weaknesses after filling and this is not totally reflected in the German document. Therefore the proposed criteria for alternative methods must be appraised very carefully and we need further time to develop all the necessary information to qualify our regard to the safety and quality of our products.

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Before considering the necessary criteria for alternatives to the water bath FEA would wish to get international agreement from the aerosol industry. Any proposal to the Sub-Committee would also be submitted to the European Commission for inclusion in an amendment to the Aerosol Directive.

In the meantime, the existing exemption mentioned in the ADR special agreement M62 should stay in force until a final solution is found, can be agreed by all parties involved.
