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**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**

**(Twenty-third session, 30 June -4 July 2003,
agenda item 4 (b))**

PACKAGINGS

Package Testing - Referencing ISO 16104 in the Model Regulations

Transmitted by the expert from the United Kingdom

Background

1. Since 1995, a working group originally established by CEN but, subsequently, a joint CEN/ISO Working Group has been working on the development of a standard for testing packagings based on Chapter 6.1.5.
2. The existing Chapter 6.1.5 has been open to wide interpretation and from time to time packages that have passed their tests in one country fail in another. The new ISO standard has attempted to eliminate most of the ambiguities that exist and at the same time give more detail on how testing should be undertaken, in order that there is more consistency between testing bodies in different countries.
3. The new standard ISO16104 (Packaging – Transport packaging for dangerous goods - Test Methods) has been adopted by ISO and interprets the provisions of Chapter 6.1.5.

The standard only fails to address four paragraphs of Chapter 6.1.5 (6.1.5.1.3, 6.1.5.1.6 6.1.5.1.8, 6.1.5.1.9) as it was considered by the working group that those pieces of text were not part of the test procedures.

4. Where appropriate it is now the increasing practice of the Sub-Committee to reference ISO standards in the Model Regulations. To improve consistency and uniformity in package testing the expert from the United Kingdom considers that this standard should also now be referenced in the UN Model Regulations.

Proposal

The expert from the United Kingdom proposes to:

Remove all existing paragraphs of 6.1.5 except 6.1.5.1.3, 6.1.5.1.6, 6.1.5.1.8 and 6.1.5.1.9 and restructure 6.1.5 as follows: **Note the original paragraphing is shown in brackets.**

6.1.5 Test Requirements for packagings

6.1.5.1 Testing of packagings

6.1.5.1.1 The testing of packagings shall be carried out in accordance with the procedures set out in ISO16104 (Packaging – Transport packaging for dangerous goods – Test Methods)

6.1.5.1.2 Tests shall be repeated on production samples at intervals established by the competent authority. For such tests on paper or fibreboard packagings, preparation at ambient conditions is considered equivalent to the requirements of 6.1.5.2.3.

(6.1.5.1.3)

6.1.5.1.3 The competent authority may at any time require proof, by tests in accordance with this section, that serially-produced packagings meet the requirements of the design type tests.

(6.1.5.1.8)

6.1.5.2 Variations to test packages

6.1.5.2.1 Where an outer packaging of a combination packaging has been successfully tested with different types of inner packagings, a variety of such different inner packagings may also be assembled in this outer packaging. In addition, provided an equivalent level of performance is maintained, the following variations in inner packagings are allowed without further testing of the package:

(6.1.5.1.6)

(a) Inner packagings of equivalent or smaller size may be used provided:

(i) The inner packagings are of similar design to the tested inner packagings (e.g. shape - round, rectangular, etc.);

(ii) The material of construction of the inner packagings (glass, plastics, metal, etc.) offers resistance to impact and stacking forces equal to or greater than that of the originally tested inner packaging;

(iii) The inner packagings have the same or smaller openings and the closure is of similar design (e.g. screw cap, friction lid, etc.);

(iv) Sufficient additional cushioning material is used to take up void spaces and to prevent significant movement of the inner packagings; and

(v) Inner packagings are oriented within the outer packaging in the same manner as in the tested package;

(b) A lesser number of the tested inner packagings, or of the alternative types of inner packagings identified in (a) above, may be used provided sufficient cushioning is added to fill the void space(s) and to prevent significant movement of the inner packagings.

- 6.1.5.2.2 If an inner treatment or coating is required for safety reasons, it shall retain its
(6.1.5.1.9) protective properties even after the tests.

Renumber the rest of 6.1.5.2 accordingly.

Consequential Amendments to the Model Regulations

Chapter 6.1.5 is mentioned in the following sections of Part 4.

- 4.1.1.3 No change
- 4.1.1.9 No change
- 4.1.1.10 Table Column 8
delete “6.1.5.5.4.(c)” replace with “ISO 16104, 7.4.3 (c)”
- Note 2
delete “6.1.5.5.4 (a)” replace with “ISO16104: 7.4.3 (a)”
- Note 3
delete “6.1.5.5.5” replace with “ISO 16104, 7.4.3”
- 4.1.1.12 delete “6.1.5.4.3” replace with “ISO 16104 7.3.4”
- 4.1.1.16.1 delete “6.1.5.1.11” replace with “ISO 16104 Annex C2”
- P405 delete “6.1.5.4” replace with “ISO 16104, 7.3”
- P601 No change
- 4.1.1.5.5. No change
- 4.1.6.1.7 Change “6.1.5.3” to “6.1.5”
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