



UN Sub-Committee of Experts Looks at Packaging Issues

The United Nations Sub-Committee of Experts on the Transport of Dangerous Goods (UNSCOE TDG) held their 58th Session remotely 28 June – 2 July 2021. The Sub-Committee considered 79 proposals during the session, which was the first of four sessions to be held during the 2021-2022 biennium.

The Experts considered several informal proposals on matters of direct interest to the industrial packaging industry. In addition, they discussed two broad proposals that could lead to significant changes in the way the Sub-Committee operates in the future.

Regulatory aspects on the use of recycled plastics (Belgium).

The Expert from Belgium asked the Sub-Committee to create a new definition for the term “suitable plastics material” in an effort to ensure that packaging manufacturers know with certainty that the secondary plastics used in the manufacture of certain plastic packagings (e.g. jerricans, bags, boxes, etc.) will result in the manufacture of safe packagings. This proposal would not directly affect existing provisions in the Model Regulations that authorize the use of recycled plastics materials derived from used drums and IBCs or production processes in the manufacture of plastic drums and IBC inner receptacles.

Representatives of the International Confederation of Container Reconditioners (ICCR), working in cooperation with representatives of several other international plastic packaging associations, submitted a statement in opposition to the Belgian proposal. ICCR believe a new definition is unnecessary and could, over time, limit the use of some recycled plastics in container manufacturing processes. ICCR also argued that the performance packaging tests are adequate to ensure safety.

Belgium said they may return to the Sub-Committee with a new proposal in the future.

Rolling Hoops Requirement for Steel Drums (Canada)

Canada requested input from the Subcommittee as to whether language in the Model Regulations requires 2 rolling hoops for all steel drums greater than 60L capacity or whether the existing provision was adopted to provide relaxation from such a requirement. The text is subject to interpretation, the relevant portion of which reads:

6.4.1.4 The body of a drum of a capacity greater than 60 litres shall, in general, have at least two expanded rolling hoops or, alternatively, at least two separate rolling hoops. (Emphasis added.)

The International Confederation of Drum Manufacturers (ICDM) submitted a response in which they argued that the current text provides an option for rolling hoops but does not mandate their use. They proposed a modification of the provision to clarify that rolling hoops are optional. The US and several other countries supported the ICDM interpretation, as did ICCR. However, several Experts questioned the need for the edit suggested. Based on the discussion, the Sub-Committee believed the provision to be optional. Canada and ICDM will consider submitting a proposed revision at a future session.

Proposal to establish an Informal Working Group on Quality (IDGA)

IDGCA is an organization representing tank container producers and is based in Russia. The group believes the provisions in the Model Regulations related to quality assurance systems are unclear.

The Experts from Germany and several other nations, including the U.S., supported the discussion and agreed to establish an intersessional working group to discuss the issue. ICCR has joined the working group out of concern that the UN could be persuaded to adopt a provision requiring the use of quality systems to produce containers used to transport dangerous goods. Presently, the U.S. does not have such a requirement.

Unified Interpretations of the Model Regulations (U.S.)

The US asked the Experts to discuss the question of incorporating interpretations into the UN system. During discussion, several Experts noted that several national regional regulatory systems do use interpretations, but this practice is not widespread. Many delegations voiced support for the concept, but others questioned how such a system would be managed and what legal standing the interpretations might have. ICCR is concerned that a system of interpretations may be unwieldy and that regulatory interpretations are probably best left to national governments.