

## CONSOLIDATED ICDM COMMENTS ON ST/SG/AC.10/C.3

We do not agree to the proposal of Spain for steel drum thicknesses.

### **Justification**

1. The UN Committee of Experts agreed at the December, 1998 meeting to modify paragraph 4.1.1.1 to accommodate the concerns of ICAO regarding the manual and mechanical handling of small steel drums encountered prior to and during air transport as follows:

*Dangerous goods shall be packed in good quality packagings, including IBC's and large packaging, which shall be strong enough to withstand the shock and loading normally encountered during transport, including trans-shipment between transport units and/or warehouses as well as any removal from a pallet or overpack for subsequent manual or mechanical handling.*

This additional compliance requirement has not yet been manifested in all the modal regulations, as it will appear for the first time in Revision II of the UN Recommendations.

At this stage there is no justification for any further changes which will affect all capacities of drums, and all types of steel containers and not other packaging materials.

2. The proposal is contrary to UN philosophy which is based on performance of the packaging with procedures as simple as possible so that worldwide compliance can be achieved.
3. We believe that optimization should be done by suppliers and packers/fillers choosing the ideal gauge combination for each application (i.e. product packed, transport mode and particular handling conditions) rather than defining a minimum thickness for all usage.
4. The effect of this proposal will increase steel thicknesses by 11-13 % without any cost/benefit analysis being undertaken. This is contrary to the policy of an environmental protection system where the primary objective of reducing packaging used is the reduction in materials at source. Fixing of material thicknesses would stop the technical progress in the steel industry.
5. We consider that the introduction of an empirical formula is a retrograde step and we would request the committee to allow the new revision to

Paragraph 4.1.1.1 to take effect at regulatory level, before considering any further changes which would have a considerable effect on a large number of industries.