



**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

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Item 6 (d) of the provisional agenda

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

**Proposal for the Establishment of an Informal Working
Group on Quality**

**Submitted by the International Dangerous Goods and Containers
Association (IDGCA)**

Introduction

1. The UN Model Regulations on the Transport of Dangerous Goods, as well as RID / ADR / ADN and other international regulations establishing the safety requirements for the transport of dangerous goods, contain, along with the safety requirements, requirements for the quality system of the manufacturer of transport equipment (packaging, containers, tanks etc.) and for the quality system of the inspection body that audits the manufacturer. The concepts of "quality", "quality system", "quality assurance system", "quality assurance programme", "quality management system" have different interpretations and understanding in different chapters of the Model Regulations.

2. A big part of the new chapter 6.9 of the UN Model Regulations regarding FRP tank-containers contains the quality system requirements for the manufacturer of portable tanks. Requirements have also been introduced for the approval of the quality system by the competent authority prior to the commencement of the production of equipment and tanks. The lack of clear definitions of the quality system under the Model Regulations, RID / ADR / ADN and other international regulations allows inspection bodies to interpret quality requirements based on their own beliefs and understandings. In our opinion, the requirements for the approval of the quality system by the competent authority are insufficiently substantiated and can lead to a significant increase in the cost of certification, within the framework of which the manufacturer and his products are confirmed to the safety standards established by the Model Regulations. In our organization's opinion, the approval of the manufacturer's quality system should not be the responsibility of the competent authority and should be applied on a voluntary basis.

Proposals

3. We propose to create an informal working group to analyze the requirements for the quality system in the Model Regulations, develop a concept for a unified understanding of the requirements for the quality system and for its approval by the competent authority and, in general, determine the feasibility and necessity of such a procedure within the framework of the Model Regulations.
