

Practical application of section 7.9.2 of the IMDG Code

6.37 The Sub-Committee considered document CCC 5/6/11 (Russian Federation), presenting information on the practical application of the provisions of section 7.9.2 of the IMDG Code in terms of the recognition of certificates and other relevant documents for the packaging of dangerous goods, as well as a proposal to amend the Code with recommendatory provisions for use as a reference.

6.38 In the ensuing discussions, the Sub-Committee noted the following views expressed:

.1 the issue on the traceability of information regarding the approval of containment systems should be recognized. However, careful consideration was needed, taking into account that there were no requirements to have certification of documentation for the containment systems;

.2 existing regulations in sections 7.9.1 and 7.9.2 provide a feasible approach;

.3 bilateral agreements would increase administrative burden and introducing additional administrative actions may not address the problems identified;

.4 taking into account the existing MSC.1/Circ.1517 on Contact information for the designated national competent authority and section 7.9.3 of the IMDG Code, the GISIS platform could be further expanded to include more contact information;

.5 the competent authority approvals for packaging of dangerous goods should be based on trust;

.6 the proposal had multimodal impacts and it would be beneficial to discuss it further at UNSCETDG; and

.7 modern technologies, such as blockchain, could be utilized in order to improve the conditions for mutual recognition of documents.

6.39 Following the discussion, the Sub-Committee acknowledged the issues associated with the recognition of certificates and other relevant documents for the packaging of dangerous goods. However, the Sub-Committee did not agree with the proposed approach as contained in document CCC 5/6/11. In this context, the Sub-Committee invited the delegation of the Russian Federation to take the above comments into account and to take action, as appropriate.