

BAM-GGR 001

Explanations on Revision 3.1 of BAM-GGR 001

The numbering 3.1 is meant to clarify that there were only a few changes compared to Revision 3 of BAM-GGR 001 dated 01.04.2014. The main changes are the removal of regulations on routine maintenance, the expansion of the maximum period of validity of a notification of recognition from 3 to 5 years and the introduction of a separate Annex 2 Tolerances, which currently only covers the category of plastics bags.

A transitional period of 3 years has been defined for notifications of recognition for routine maintenance (see last paragraph on page 2). A reference to the granting of an authorised symbol for the marking of routine maintenance has been included (see footnote on page 6).

The changes (deletions and replacements) can be summarised as follows:

- all references to the granting of a QAP recognition for routine maintenance have been removed (see Part B, in particular B.8, of BAM-GGR 001 Revision 3 dated 01.04.2014)
- the period of validity of the notification of recognition was expanded from a maximum of 3 years to a maximum of 5 years (A.4.1/B.4.1/C.4.1)
- an Annex 2 to Part A was introduced, which contains rules on tolerances (separate document)
- the legal references have been updated (all parts)
- it was specified that deviating arrangements must be agreed in writing (directly before A.1/B.1/C.1/D.1/E.1)
- it has been clarified that no surveillance visit is carried out in the calendar year of the initial audit (A.2.2/B.2.2/C.5.2)
- it was added that surveillance documents should preferably be submitted in electronic format (A.2.2/A.2.4/B.2.2/B.2.4/C.5.2)
- it was clarified that the notification of inactive production of dangerous goods packagings should be submitted on schedule (A.4.3/B.4.3)
- the references to Annex 1 in Part B have been deleted, as no corresponding information is contained in Annex 1; this will be taken into account in revision 4 of BAM-GGR 001 (see B.10 of BAM-GGR 001 revision 3 dated 01.04.2014)
- "delivered" has been changed to "delivered to customers" to make clear that external storage facilities belonging to the manufacturer/remanufacturer/reconditioner/repairer are not affected by the rule (A.2.5.4/B.2.5.4)
- the phrase "Audits or surveillance visits are to be evaluated negatively if serious or safety-related non-conformities [...] were observed" was deleted, because such assessment is no longer reflected in the surveillance documents (see A.2.4/B.2.4 of BAM-GGR 001 Revision 3 dated 01.04.2014)
- the numbering of the templates has been removed as it is impractical, especially with regard to the surveillance protocols (A.9/B.9/C.9)
- it was added that the audit report includes the QAP review (A.9/B.9)
- "re-audit" became "supplementary audit" as it describes the current procedure more clearly (A.2.1/A.2.2/A.3.2/B.2.1/B.2.2/B.3.2)
- the synonyms "manufacturing" and "reconditioning" have been removed, instead "manufacturing/remanufacturing" and "reconditioning/repair" are used (all parts)
- the synonyms "manufacturer" and "reconditioner" have been removed, instead "manufacturer/remanufacturer" and "reconditioner/repairer" are used (all parts)

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- "UN marking" has been replaced by "UN marks" (plural) as an alignment to the wording of the ADR (all parts)
 - "design type" has been replaced by "types of dangerous goods packagings" in some cases (all parts)
 - at one occurrence, "packaging type" has been replaced by "design type" because a design type is being tested (E.6)
 - it was clarified that the status of a QAP recognition can be published (A.6/B.6); currently it is not published
 - it was added that the status of QSP recognition is only published if a valid declaration of consent is available at BAM (A.6/B.6); currently the status is not published
 - it was added that deputies of the head may also be appointed as part of the management of a surveillance body (Part C)
 - the term "assessor" is now used throughout (all parts)
 - there is a clarification that the management examines not only the surveillance report but the whole surveillance documentation (C.5.2/C.8)
 - it was clarified that the list of surveillance bodies recognised by BAM can be published (C.6)
 - it was added that a surveillance body is only included in the list of surveillance bodies if an effective declaration of consent has been submitted to BAM (C.6)