



MINISTRY OF INTERIOR
NATIONAL DIRECTORATE FOR DISASTER MANAGEMENT
AUTHORITY DEPUTY DIRECTOR'S ORGANISATION
NATIONAL INDUSTRIAL SECURITY DIVISION

Subject: type permit for the production of
packaging used for transporting dangerous goods
Reference No.: EPAPIR-20230831-1879
Administrator: Albert Szitás fireman lieutenant
colonel
Phone: +36 1/469-4363

RESOLUTION

Upon the request filed by Bence Molnár (7700 Mohács, Virág u. 36.), authorized by NS Automatyka Sp. z.o.o. (registered seat: ul. Lesna 2a, 37310 Nowa Sarzyna, Poland hereinafter: Client) for the type permit of producing packaging used for transporting dangerous goods, I hereby

approve

the manufacturing type of the requested IH1 (plastics drums with non-removable head) dangerous goods packaging with a capacity of 1000 ml in the authority licensing procedure initiated before the Ministry of Interior, National Directorate for Disaster Management (hereinafter: Authority) under the following terms and conditions:

1. With the withdrawal or expiry of the certification of the manufacturing quality management system, this resolution also loses effect.
2. The report taken on the type tests shall be kept for 5 years.
3. This approval loses effect if the design of the packaging is changed. The tests shall be repeated after each modification of the packaging that changes the structure, material or manufacturing of the packaging. The documentation containing the results of the repeated tests shall be sent to the Authority for approval, within the frameworks of a new licensing procedure.
4. The chemical compatibility of the packaging and the dangerous goods shall be tested during manufacturing and use.
5. The packaging manufactured according to the above shall bear the following mark:



1H1/Y1,2/100/*/H/NSA-6926-23-OKF

* = manufacturing month and (the last two digits of the) year

6. The marking contained in Section 5 of the operative part of the resolution can only be applied in accordance with the technical content included in the test report No. 547-1-23, to the packaging manufactured by NS Automatyka Sp. z.o.o..
7. Made from recycled plastic as defined in section 1.2.1 of the ADR. shall be marked with the "REC" mark, which shall be affixed in accordance with the following requirements It shall be placed close to the markings in point 5.

Cím: 1149 Budapest, Mogyoródi út 43., 1903 Bp. Pf.: 314
Telefon: +36 (1) 469-4363 Fax: +36 (1) 469-4350
E-mail: okf.iparbiztonsag@katved.gov.hu

This resolution is valid for the manufacturing of an unlimited number of packaging, until withdrawal, and until the relevant regulations are modified, but no later than 25 August 2026.

The Client's proxy has paid the established administrative service fee of HUF 40,500 as the cost of the procedure to the account no. 10023002-00283494-00000000 of the Ministry of Interior, National Directorate for Disaster Management.

No administrative fee shall be repaid to the Client.

No appeals may be lodged against this resolution, it is final upon communication. The Client may initiate public administration lawsuit against the resolution, within 30 days after receipt in a claim addressed to the Public Administration and Labour Court of Budapest, filed to the authority making the first instance decision.

The party acting with a legal representative and the economic operators with domestic residence shall file their claims by using the form submission support service, to the body adopting the public administration resolution. The party acting with a legal representative and the economic operators with domestic residence – if it does not act with an attorney representative – may also proceed during electronic filing by using the service ensuring the comprehensive identification of the representative or the form submission support service, if it has such service.

The plaintiff may request a hearing in the claim, the defendant in the defence. Hearing may be requested in the lawsuit application, or within fifteen days following the entering of the lawsuit. No certification may be filed if the application for hearing is failed to be submitted.

Explanation

The Client – via its proxy – filed its application on 31 August 2023 with ID No. EPAPIR-20230831-1879, for the licensing of the manufacturing type of 1H1 (plastics drums with non-removable head) packaging for dangerous goods with a capacity of 1000 ml manufactured by it.

Based on the available documents I have established that the Client filed the technical documentation and statements required for assessing the application, and the certificate of paying the administrative service fee.

During the authority procedure, it was established on the basis of the filed technical documentation, the results of the test report No. 5471-23 issued by the Packaging and Environmental Testing Laboratory of the Széchenyi István University (9026 Győr, Egyetem tér 1., accreditation number: NAH-1-1454/2023) attached to this resolution, and the manufacturer's valid quality management system that the packaging complies with the requirements set out in Chapter 6.1 of the regulation contained in Annex 2 of Government Decree 178/2017. (VII. 5.) on the announcement of Annexes A and B of the European Agreement of 30 September 1957 concerning the International Carriage of Dangerous Goods by Road (hereinafter: ADR) and certain issues of domestic application, and in Chapter 6.1 of

the regulation contained in Annex 2 (hereinafter: RID) of Government Decree 179/2017. (VII. 5.) on the announcement of Appendix C of the Convention concerning International Carriage by Rail (COTIF) as amended by the Vilnius Protocol on 3 June 1999, and certain issues of domestic application.

I have established the conditions on the basis of Chapter 6.1 of the ADR and RID.

According to the test performed by the accredited Packaging and Environmental Testing Laboratory of the Széchenyi István University, the packaging is suitable for marine transportation according to IMDG code, and for air transportation according to IATA DGR and ICAO TI.

The conditions set out in the operative part on the basis of the following legal provisions I have established:

1. according to ADR 6.1.1.4

6.1.1.4 Packagings shall be manufactured, reconditioned and tested under a quality assurance programme which satisfies the competent authority in order to ensure that each packaging meets the requirements of this Chapter.

2. Pursuant to Section 24/E (8) of Act CXXVIII of 2011 on Disaster Management and the Amendment of Certain Related Acts (hereinafter: Cat. Act): 'Section 24/E (8) *No fine may be imposed if the detection of the infringement is made within 5 years of the expiry of the manufacturing type approval permit 5 years after the expiry of the five-year period of validity of the type type approval.*'

3. according to ADR 6.1.5.1.4

6.1.5.1.4 Tests shall also be repeated after each modification which alters the design, material or manner of construction of a packaging.

4. according to ADR 6.5.2.2.2

6.5.2.2.2 The maximum permitted stacking load applicable when the IBC is in use shall be displayed on a symbol as shown in Figure 6.5.2.2.2.1 or Figure 6.5.2.2.2.2. The symbol shall be durable and clearly visible.

5. according to ADR 6.5.5.2.6

6.5.5.2.6 For flexible plastics IBCs where protection against ultraviolet radiation is required, it shall be provided by the addition of carbon black or other suitable pigments or inhibitors. These additives shall be compatible with the contents and remain effective throughout the life of the body. Where use is made of carbon black, pigments or inhibitors other than those used in the manufacture of the tested design type, re-testing may be waived if changes in the carbon black content, the pigment content or the inhibitor content do not adversely affect the physical properties of the material of construction.

6. according to ADR 6.1.3.1 and 6.1.5.1.1

6.1.3.1 Each packaging intended for use according to the ADR shall bear marks which are durable, legible and placed in a location and of such a size relative to the packaging as to be readily visible.

6.1.5.1.1 The design type of each packaging shall be tested as provided in 6.1.5 in accordance with procedures established by the competent authority allowing the allocation of the mark and shall be approved by this competent authority.

For the procedure, the Client has paid the administrative service fee specified in Annex 1 and Sections 1 (1)-(2) of BM Decree No. 52/2019. (XII. 30.) on the administrative service fee to be paid for the approval procedures of various packaging used for transporting dangerous goods subject to the competence of the authority for disaster management.

The legal basis of this resolution is Section 17 and Section 80 (1) of Act CL of 2016 on the general rules of administrative proceedings.

Pursuant to Section 41 (1) a) of the Act on the general rules of administrative proceedings, if on the basis of the filed application and the annexes, and the data available to the authority, the statement of facts is clear, short procedure may be applied. The Client's application filed to the authority complies with the content element requirements contained in Annex 12 of *Government Decree 234/2011 (XI.10.) of the Government implementing Act No. CXXVIII of 2011 concerning disaster management and amending certain related acts*, and therefore, my authority applied a short procedure.

Pursuant to Section 116 (4) a) of the Act on Public Administrative Proceedings, no appeals may be lodged if the decision of first instance was adopted by the manager of a central public administration body, the resolution becomes final by communication pursuant to Section 82 (1) of the Act on Public Administrative Proceedings.

I have excluded the right to appeal pursuant to Section 112 and Section 116 of the Act on Public Administrative Proceedings.

I have established the possibility of public administrative lawsuit on the basis of Section 113 (1) a) and 114 (1) of the Act on Public Administrative Proceedings.

Pursuant to Section 605 (1) of Act CXXX of 2016 on the Code of Civil Procedure, in the lawsuit, the party not obliged to communicate electronically or its representative not qualifying as a legal representative – with the exceptions specified in Section (5) – may file the claim and all other files and attachments or documents (hereinafter: claims) electronically in the way set out in Act CCXXII of 2015 on the General rules for electronic administration and trust services (hereinafter: E-administration act) and its implementation decrees.

Pursuant to Section 608 (1) of the Act on the Code of Civil Procedure, the party obliged to communicate electronically according to the E-administration act shall file all claims to the court electronically – in the way set out in the E-administration act and its implementation decrees, and the court also sends the files electronically.

I have arranged the communication of this resolution in accordance with Sections 85 (1) and (3) of the Act on the general rules of administrative proceedings.

The competence and scope of the Authority are based on Section 22 (1) a) of *Act CXXVIII of 2011 on disaster management and amending certain related acts*, and Section 4/D of the Government Decree.

Date: Budapest, according to the electronic stamp.

On behalf and in the name of the director of BM OKF

Bonifác Kovács firefighter colonel
national industry security supervisor

Contents: 4 pages

Annexes: 8 pages (test report No. 547-1-23)

Recipients: NS Automatyka Sp. z.o.o. (registered seat: ul. Lesna 2a, 37310 Nowa Sarzyna, Poland) acting on behalf of Bence Molnár (7700 Mohács, Virág u. 36.) - (via company portal)

Cím: 1149 Budapest, Mogyoródi út 43., 1903 Bp. Pf.: 314

Telefon: +36 (1) 469-4363 Fax: +36 (1) 469-4350

E-mail: okf.iparbiztonsag@katved.gov.hu

