

**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

(Twenty-third session, 30 juin-4 July 2003

agenda item 4 (c))

PACKAGINGS

Proposed Comments to INF.4

“New Requirements for Rigid Plastic (H) IBCs and Composite IBCs (HZ)”

Transmitted by

International Confederation of Container Reconditioners (ICCR)

International Council of Chemical Associations (ICCA)

International Confederation of Plastics Packaging Manufacturers (ICPP)

1. The Expert from Spain has asked the Sub-Committee of Experts to take a decision concerning the benefit of distinguishing between so-called “single-trip” rigid plastic and composite intermediate bulk containers (IBCs) and “multi-trip” IBCs of the same construction.
2. ICCR, ICCA and ICPP oppose this proposal for the following reasons:
 - (a) Rigid plastics IBCs (i.e., 11H1, 11H2, 21H1, 21H2, 31H1, and 31H2) are constructed by manufacturers throughout the world in a manner that allows their safety in multi-trip applications.
 - (b) Composite IBCs (i.e., 11HZ1, 11HZ2, 21HZ1, 21HZ2, 31HZ1 and 31HZ2) are constructed in a manner that allows their safety in multi-trip applications.
 - (c) Manufacturers of rigid plastic and composite IBCs do not exert direct control over the subsequent use and reuse of IBCs following initial filling. Moreover, 4.1.1.9 already requires each IBC to be inspected prior to reuse, and forbids the reuse of the IBC if it shows signs of reduced strength as compared to the tested design type.
 - (d) The UN Committee of Experts has reviewed the issue of IBC reuse and, based upon these deliberations, included in the Model Regulations specific guidelines defining IBC reuse terms (See Chapter 1.2), and governing the inspection, testing, (See Chapter 6.5), and marking (See Chapter 4.1) of rigid plastics and composite IBCs that are repaired, remanufactured and routinely maintained for the purpose of reuse.
 - (e) Rigid plastics and composite IBCs are reused regularly and extensively for dangerous goods transportation throughout the world. We estimate that more than 1.25 million composite IBCs are reprocessed and reused in North America and Europe annually. Although similar figures regarding the reuse of rigid plastics IBCs are not available, it is known that tens of thousands of these units have been manufactured over the years, and many are used as multi-trip dangerous goods transportation containers for extended periods of time.
 - (f) ICCR, ICPP and ICCA are unaware of any reports of dangerous goods container failures indicating that the reuse of the aforementioned IBCs is unsafe in transportation.
3. ICCR, ICPP and ICCA see no reason to pursue this issue.

