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Working Party on the Transport of Dangerous Goods

**Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern, 24-28 March 2003)**

PART 1 OF RID/ADR

Chapter 1.6, Transitional Measures for IBCs

Transmitted by the Expert of Germany

Introduction:

With the implementation of the 2001 revised edition of ADR/RID, IBC shall, in acc. with 6.5.2.1.1 be marked with letters, numerals and symbols at least 12 mm high. The previous edition of ADR/RID did not specify the height of the marking. Transitional provisions for existing design types and IBCs are not provided.

Proposal:

It is proposed to introduce a transitional clause in ADR/RID, Chapter 1.6 in order to clarify the situation. It is proposed, that the revised marking requirements shall apply only to IBC that are manufactured after 31 December 2002, as follows:

- 1.6.X.X¹** IBCs manufactured in accordance with the requirements of para. 1612 (1) RID / 3612 (1) ADR applicable up to 31 December 2002 and marked with letters, numerals and symbols less than 12 mm high may be used.

Justification:

The revision of the IBC marking requirements was a consequential alignment with the marking requirements for packages, which had been including provisions on the size of the

¹ The numbering may require the introduction of a new division for packagings, including IBCs and large packagings, because it is the first clause for this category.

marking in earlier editions of ADR/RID. This revision was deemed reasonable to achieve the same level of visibility of the marking.

On the other side, an obligation for existing IBCs to be re-marked in the required size would create tremendous difficulties. Millions of IBCs have been put on the market, crossing borders and changing owners and users.

Any re-marking would require that essential questions would need to be addressed, such as:

- Who is authorized to change the marking,
- How can re-marking be organised crossing borders,
- Which elements of the marking need to re-marked,
- Which technical means are allowed in case of embossed or similar markings,
- Is a double marking allowed,
- And others.