

## 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

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### PERFORMANCE OF PACKAGINGS, INCLUDING IBCs

#### Cross bottling of IBCs

Transmitted by the expert from the United Kingdom

#### **Introduction**

1. The Sub-Committee will have already seen ST/SG/AC.10/C.3/2008 and UN/SCETDG/33/INF4. These papers outlined the progress that the correspondence working group had made in examining the problem of cross bottling of IBCs and highlighted the areas that the working group felt needed further discussion. In the working paper the expert from the United Kingdom undertook to submit on behalf of the correspondence group an informal paper containing proposals for consideration by the Sub-Committee.

#### **Proposed changes to the Model Regulations**

2. Following the correspondence group responses the expert from the UK considers that there is sufficient support for a number of changes to the regulations.

- Changing the term 'original manufacturers' specification' in the definition of repaired IBC to 'original design type' in order to make more clear that the process of repair can only permit the replacement of an inner bottle of the same specification as that originally supplied with the composite IBC. This position was supported by all correspondents. In addition, the proposal is to further restrict a replacement inner bottle to that of the same manufacturer as the original. This was supported by a large majority, although some saw this as a possible restriction of trade issue;
- Ensuring that the marking of the inner receptacle and the outer frame of composite IBCs can be clearly associated with each other. This would be intended to aid identification to ensure that each inner bottle can only be associated with the correct type of outer casing. This need not be in the form of a complete UN

mark for the IBC, but does need to be more detailed than the current requirements. This was supported by a large majority;

- Ensuring that there is a clear distinction between an original design type IBC and a remanufactured IBC in order that no liability questions can arise. This was supported by all correspondents.

3. All members of the correspondence group agreed the need for a quality assurance system to be applicable to repaired or remanufactured composite IBCs but some considered that this is already addressed by application of 6.5.4.1. or by the reference to application of other provisions in the definition of remanufactured IBC in 1.2.1. However, the text in 6.5.4.1 is specific to IBCs ‘manufactured and tested’ and perhaps this needs to be amplified by adding a reference to repair and remanufacture of IBCs. The majority supported this view.

4. Whilst some competent authorities operate a registration scheme for repairers or remanufacturers of IBCs there was little support for the need for the general application of a registration requirement.

### **Proposals**

5. Below are proposals which the correspondence group requests the Sub-Committee to consider for adoption into the Model Regulations (new text is underlined):

#### **a) *Repaired IBC***

The current definition in Chapter 1.2 is

“*Repaired IBC*” means a metal, rigid plastics or composite IBC that, as a result of impact or for any other cause (e.g. corrosion, embrittlement or other evidence of reduced strength as compared to the design type) is restored so as to conform to the design type and to be able to withstand the design type tests. For the purposes of these Regulations, the replacement of the rigid inner receptacle of a composite IBC with a receptacle conforming to the original manufacturer's specification is considered repair. However, routine maintenance of rigid IBCs is not considered repair. The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs are not repairable. Flexible IBCs are not repairable unless approved by the competent authority;”

Replace with:

“*Repaired IBC*” means a metal, rigid plastics or composite IBC that, as a result of impact or for any other cause (e.g. corrosion, embrittlement or other evidence of reduced strength as compared to the design type) is restored so as to conform to the design type and to be able to withstand the design type tests. For the purposes of these Regulations, the replacement of the rigid inner receptacle of a composite IBC with a receptacle conforming to the original design type from the same manufacturer is considered repair. However, routine maintenance of rigid IBCs is not considered repair. The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs are not repairable. Flexible IBCs are not repairable unless approved by the competent authority;”

**b)        *Marking of IBC components***

The current text of 6.5.2.2.4 is as follows;

“The inner receptacle of composite IBCs shall be marked with at least the following information:

- (a) The name or symbol of the manufacturer and other identification of the IBC as specified by the competent authority as in 6.5.2.1.1 (f);
- (b) The date of manufacture, as in 6.5.2.1.1 (d);
- (c) The distinguishing sign of the State authorizing the allocation of the mark, as in 6.5.2.1.1 (e).”

Replace with a new 6.5.2.2.4:

“The inner receptacle of composite IBCs shall bear the markings as specified in 6.5.2.1.1 (b), (c), (d) where this date is that of the manufacture of the plastics inner receptacle, (e) and (f). The UN packaging symbol shall not be applied. The marking shall be applied in the sequence shown. It shall be durable, legible and placed in a location so as to be readily visible when placed in the outer casing.”

**c)        *Clarify the conditions for remanufacturing IBCs***

Add a new paragraph 6.5.2.4 as follows:

“6.5.2.4 Marking of remanufactured composite IBCs (31HZ1)

The marking specified in 6.5.2.1.1 and 6.5.2.2 shall be removed from the original IBC and new markings shall be applied to a remanufactured IBC in accordance with these Regulations.”

**d)        *Quality assurance***

Amend 6.5.4.1 to read:

“Quality assurance: the IBCs shall be manufactured, remanufactured, tested and repaired under a quality assurance programme which satisfies the competent authority, in order to ensure that each manufactured, remanufactured or repaired IBC meets the requirements of this Chapter.”

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