

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

Chapters 1.2.1, 4.1 and 6.6

Transmitted by the expert from France

1. As far as packagings are concerned, definitions have been introduced in chapter 1.2.1 to explain the meaning of operations that may be performed on them such as remanufacturing and reuse.
2. However, such definitions do not exist for large packagings and it is not presently clear if the definitions for packagings can apply to large packagings. In addition, as currently written, chapter 4.1 (such as 4.1.1.1.1 or 4.1.1.9) does not specify whether the use of remanufactured large packaging is authorized or not.
3. With respect to the use of remanufactured large packagings, the expert from France received a number of queries on this subject to convert non-UN packagings to UN large packagings or to convert UN IBCs to UN large packagings to transport UN 3291 or other wastes. In introducing the possibility to use UN large packagings, the expert from France thinks that it will encourage the shippers of those products to comply with the applicable regulations.
4. Therefore, the expert from France proposes to introduce definitions in 1.2.1 to define remanufactured large parkagings and reused large packagings and to amend the appropriate paragraphs of chapter 4.1 and 6.6 to clarify the situation, as follows :

Proposal 1

1. In Sub-section 1.2.1, add the following new definitions :

"Remanufactured large packaging means a metal or rigid plastics large packaging that :

- (a) is produced as a UN type from a non-UN type ; or

(b) is converted from one UN design type to another UN design type.

Remanufactured large packagings are subject to the same requirements of these Regulations that apply to new large packagings of the same type (see also design type definition in 6.6.5.1.2).

Reused large packaging means a large packaging to be refilled which has been examined and found free of defects affecting the ability to withstand the performance tests : the term includes those which are refilled with the same or similar compatible contents and are transported within distribution chains controlled by the consignor of the product."

Proposal 2

2 Amend the end of the last sentence of 4.1.1.1 to read (new text underlined) :

"...and to new, reused or remanufactured large packagings."

Proposal 3

3 Amend 6.6.1.2 to read (new text underlined) :

"Large packagings shall be manufactured, tested and remanufactured under a quality assurance program which satisfies the competent authority in order to ensure that each manufactured or remanufactured large packaging meets the requirements of this chapter."

Proposal 3 is aligned on the draft amended text for 6.5.4.1 as proposed for adoption in INF 31 (Cross bottling of IBCs - proposal d)).

4. The sub-committee is invited to consider this proposal for adoption into the Model Regulations.
