

## 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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Item 3 of the provisional agenda

**Listing, classification and packing**

### **Comments on ST/SG/AC.10/C.3/2017/36; Multiple marking of packagings, including IBCs and large packagings, indicating conformity with more than one successfully tested design type**

#### **Transmitted by the International Confederation of Intermediate Bulk Containers Association (ICIBCA)**

1. ICIBCA has considered the proposal by CEFIC and DGAC in ST/SG/AC.10/C.3/2017/36 and appreciates the opportunity to provide its comments.

2. With respect to the proposal in the paper, ICIBCA has the following comments:

(a) **The decision on what UN marks are applied should be left to the manufacturer.** As written, the proposed text could be taken to mean that a manufacturer is required to apply UN package markings on a package reflecting the full range of design testing for which a package has been qualified. ICIBCA does not agree with imposing such a mandate on the manufacturer. While multiple UN markings should be allowed to appear on a packaging, ICIBCA is of the opinion that a manufacturer of a packaging should be left to decide what marks it chooses to apply.

(b) **Multiple UN marks are already permitted.** ICIBCA notes that there is currently no prohibition against placing multiple markings on a packaging and on this basis, considers that a manufacturer may already apply more than one UN mark, if appropriate. In fact, under US regulations it is stated:

“Where a packaging conforms to more than one UN standard . . . . , the packaging may bear more than one marking, provided the packaging meets all the requirements of each standard . . . . Where more than one marking appears on a packaging, each marking must appear in its entirety.” (ref. §178.3(c) of the Hazardous materials Regulations)

While ICIBCA does not view it necessary to include such a provision in the Model Regulations, should the Subcommittee deem it appropriate, ICIBCA prefers a provision similar to that already in US regulations.

(c) **Location of any new UN package marking requirement within the UN Model Regulations.** ICIBCA is of the opinion that any requirement affecting package marking should be located with other requirements affecting package manufacture and marking. If deemed necessary, any new requirement based on the proposal in ST/SG/AC.10/C.3/2017/36 should be placed in Part 6 in the chapters relevant to the packagings concerned (i.e., Chapters 6.1, 6.5 and 6.6).

(d) **Use of abbreviated markings.** The proposal would allow complete package marks or applied “in multiple combination to indicate those design criteria and performance test provisions that have been met.” Without further guidance, the potential exists for varying interpretations of what would constitute an acceptable package mark reflecting multiple designs. In ICIBCA’s opinion merging multiple design certifications within a single mark could lead to confusion and should be avoided.

### **Alternative proposals**

3. ICIBCA further notes that the intent of the CEFIC/DGAC proposal is to clarify that a packaging certified for liquids may be used to contain substances that meet the definition of a solid (i.e., melting point greater than 20C) but are either loaded into a packaging as a liquid or liable to become liquid under normal conditions of transport. ICIBCA notes that paragraph 4.1.3.4 currently prohibits substances which may liquefy from being transported in certain packages not designed to retain liquids (e.g., paper bags). In addition, ICIBCA notes that IBCs certified for liquids may already be used for solids under packing instruction IBC 08. For consistency, ICIBCA recommends that the text in 4.1.3.4 be revised to include a new first sentence reading:

“For substances that are loaded into a package in a liquid state or which are liable to become liquid in transport, a packaging certified for liquids may be used provided the mass of the solid substance transported does not exceed the maximum mass indicated by the package marking.”

4. Should the Sub-Committee find it helpful to recognize the use of multiple package marks, ICIBCA proposes the following alternative text for location in Chapters 6.1, 6.5 and 6.6:

“Where a packaging conforms to more than one tested design type, the packaging may bear more than one marking. Where more than one marking appears on a packaging, the markings must appear in close proximity to one another and each marking must appear in its entirety.”

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