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**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****Fifty-third session**

Geneva, 25 June-4 July 2018

Item 3 of the provisional agenda

**Listing, classification and packing****Multiple marking of packagings, including intermediate bulk  
containers (IBCs) and large packagings, indicating  
conformity with more than one successfully tested design  
type (part II)****Transmitted by the European Chemical Industry Council (CEFIC)  
and the Dangerous Goods Advisory Council (DGAC)\*****Introduction**

1. At the fifty-second session of the Sub-Committee, CEFIC and DGAC raised the topic of multiple marking of packagings, including IBCs and large packagings, indicating conformity with more than one successfully tested design type. Their document ST/SG/AC.10/C.3/2017/36 together with informal document INF.23 by the International Confederation of Intermediate Bulk Containers Association (ICIBCA) and informal document INF.45 by the International Confederation of Container Reconditioners (ICCR) were discussed with focus on two aspects:

- General permissibility of multiple UN marks applied to packages based on the conformance to one or more than one successfully tested design type.
- Permissibility of multiple approvals for packages that simultaneously conform to more than one design type of the same or different kind and category.

2. In a first step consensus was reached on the permissibility of the current practice to issue multiple approvals for successfully tested design types which belong to the same regime of packages. Based on informal document INF.51 by CEFIC and DGAC, an interim text was adopted for locations in Chapters 6.1, 6.5 and 6.6 providing technical guidance where

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\* In accordance with the programme of work of the Sub-Committee for 2017-2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, paragraph 14)

required, how to apply simultaneously and in an acceptable manner the different UN marks reflecting conformance to more than one successful tested design type.

## Discussion

3. The current document submitted by CEFIC and DGAC resumes the topic on multiple approved packages and aims to address the remaining issue of multiple approvals overarching between the same or different kinds and categories of packages.

4. When applying the concept of design type approvals consequently based on design criteria and performance test requirements, it is obvious that certain designs and constructions, e.g. boxes and IBCs, may simultaneously provide compliance to various design types of different kind and category of packagings, IBCs and large packagings as well. For the sake of legal certainty and to support flexibility in service, multiple approvals for packagings, including IBCs and large packagings, should be permissible to certify conformance to any successfully tested design type of the same or different kind and category.

5. It should be explicitly allowed in the regulations to apply the specific marks to the packagings, including IBCs and large packagings, individually or in multiple combination, in close proximity to one another and in its entirety to indicate compliance to any of the corresponding design types. The user shall be aware about the display of multiple design type certifications simultaneously on the same package to take advantage of the full set of information about all safety-relevant performance parameters, which is of crucial importance to ensure safety and compliance within the packing process.

6. Without any compromise on safety, the use of multiple-approved packagings, including IBCs and large packagings, is in full compliance with the respective packing provisions of Chapter 4 for each of the corresponding design types and the specific transport conditions required by the allocated substances. Traceability of a proper selection of the design type permitted by the respective packing instructions is ensured by the required transport documentation according to 5.4.1.5.

7. At the last session of the Sub-Committee some delegations expressed concerns that the definition of IBCs in 1.2.1, “IBC means any rigid or flexible portable packaging, other than those specified in Chapter 6.1, that: ...”, might conflict with a multiple approval of a package being compliant simultaneously with a design type of the IBC regime and a design type belonging to the packaging regime as well.

8. The phrase “other than those specified in Chapter 6.1” just provides the information that IBC design types are not found among the packaging design types specified in Chapter 6.1. However, the possibility that an IBC design type may simultaneously conform to common design criteria of packaging design types specified in Chapter 6.1 needs not to be excluded, e.g. in the practical case of IBCs and boxes.

9. The different types and categories of IBCs are clearly defined by the related design type criteria specified in Chapter 6.5. IBCs distinguish from packagings by their higher limit in capacity, the integrated handling equipment interface features and their capability to resist stress produced in mechanical handling, as determined by specific tests defined in Chapter 6.5. Although these technical specifics of IBCs are not addressed in the packaging regime, they also do not conflict with design criteria and performance test requirements of packagings.

10. The explicit exclusion from packagings specified in Chapter 6.1, as stipulated in the definition of IBCs in 1.2.1, does not provide any guidance nor additional requirements for the design of IBCs. On the contrary, there is no technical justification nor any benefit in safety

to exclude multiple design type approvals among IBCs and packagings by formal reasons based on constringent definitions.

## Proposals

11. To prevent regulatory barriers, which contradict the concept of design type approvals based on design criteria and performance test requirements, amend the definition of IBCs in 1.2.1 to read as follows:

*“Intermediate Bulk Container (IBC)*

IBC means any rigid or flexible portable packaging, ~~other than those specified in Chapter 6.1,~~ that:

- (a) has a capacity of: ...
- (b) is designed for mechanical handling;
- (c) is resistant to the stresses produced in handling and transport, as determined by tests.”

12. To support awareness of the user about the permissibility of multiple approved design types supplement 4.1.1 by a new sub-paragraph under 4.1.1.3 to read as follows:

“4.1.1.3.1 Packagings, including IBCs and large packagings, may conform to one or more than one successfully tested design type of the same or different kind and category, and may bear more than one mark to display the relevant performance parameters in accordance with the requirements of 6.1.3.13, 6.5.2.1.3 or 6.6.3.4, as applicable.”

13. To fully implement the concept of design type approvals consequently based on design criteria and performance test requirements, remove the square brackets and amend the interim text adopted at the last session of the Sub-Committee under 6.1.3.13, 6.5.2.1.3 and 6.6.3 (see ST/SG/AC.10/C.3/104/Add.1, annex II) to read as follows:

“6.1.3.13 Where a packaging, including IBCs and large packagings, conforms to one or more than one tested ~~packaging~~ design type, the packaging, including IBCs and large packagings, may bear more than one mark to indicate the relevant performance test requirements that have been met. Where more than one mark appears on a packaging, including IBCs and large packagings, the marks must appear in close proximity to one another and each mark must appear in its entirety.”

“6.5.2.1.3 Where an IBC, including packagings and large packagings, conforms to one or more than one tested ~~IBC~~ design type, the IBC, including packagings and large packagings, may bear more than one mark to indicate the relevant performance test requirements that have been met. Where more than one mark appears on an IBC, including packagings and large packagings, the marks must appear in close proximity to one another and each mark must appear in its entirety.”

“6.6.3.4 Where a large packaging, including packagings and IBCs, conforms to one or more than one tested ~~large packaging~~ design type, the large packaging, including packagings and IBCs, may bear more than one mark to indicate the relevant performance test requirements that have been met. Where more than one mark appears on a large packaging, including packagings and IBCs, the marks must appear in close proximity to one another and each mark must appear in its entirety.”