

**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals**

**20 June 2018**

**Sub-Committee of Experts on the Transport of Dangerous Goods**

**Fifty-third session**

Geneva, 25 June-4 July 2018

Item 6 (b) of the provisional agenda

**Miscellaneous proposals for amendments to the Model**

**Regulations on the Transport of Dangerous Goods:**

**Packagings**

**Comment on papers 2018/27, 2018/34, 2018/44, 2018/45,  
2018/46 and 53/INF.16: Proposal to convene an IBC Working  
Group**

**Transmitted by the expert from the United Kingdom**

**Introduction**

1. In reviewing the working papers for the 53<sup>rd</sup> meeting of the Sub Committee, the expert from the United Kingdom notes that there are six papers dealing with various parts of the text in Chapter 6.5, which deals with the requirements for the construction and testing of intermediate bulk containers. These are (ST/SG/AC.10/C.3/2018/27, ST/SG/AC.10/C.3/2018/34, ST/SG/AC.10/C.3/2018/44, ST/SG/AC.10/C.3/2018/45, ST/SG/AC.10/C.3/2018/46 and NF.16.
  2. The expert from the United Kingdom notes the differences in approach to metal IBCs identified in 2018/34, and is also aware of other differences in the approach taken by the IBC text to that of other packagings in the UN Recommendations. For example pressure testing, venting, repair and inspection.
  3. The expert from the United Kingdom is reminded by these six papers that the text of Chapter 6.5 has not been the subject of review for around 20 years. During that time the number and types of IBC in transport have proliferated, providing a significant body of experience with this type of packaging.
  4. The expert from the United Kingdom would therefore be in favour of conducting a substantive review of the whole of Chapter 6.5 and the relevant associated text in Chapter 4. The expert from the United Kingdom is prepared to organise an Intersessional Working Group on this subject with the aim of providing revised text by the end of the next biennium.
  5. Should this proposal be acceptable to the Sub-Committee, then the expert from the United Kingdom would welcome input from other experts detailing their areas of interest or concern regarding IBCs, so that a detailed scope for the working group can be tabled at the 54<sup>th</sup> session.
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