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COMMITTEE OF EXPERTS ON THE  
TRANSPORT OF DANGEROUS GOODS

(Twentieth session,  
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agenda item 2 (b))

WORK OF THE SUB-COMMITTEE OF EXPERTS ON  
THE TRANSPORT OF DANGEROUS GOODS

Draft amendments to the Model Regulations  
on the Transport of Dangerous Goods

New proposals \*/

Testing and shipping of Intermediate Bulk Containers (IBC)

Transmitted by the expert from India

At its thirteenth session, the Sub-Committee considered ST/SG/AC.10/R.541 from the United States of America and amended para. 4.1.2.10 as follows:

IBCs filled before the expiry date of the last test or inspection could be transported after that date for the purpose of undergoing a further test or inspection under the following conditions:

- (a) empty, uncleaned IBCs, no date limit;
- (b) filled IBCs, three months after the deadline;
- (c) IBCs filled with a substance which must be disposed of or recycled, three additional months after the first three months of exemption provided that a suitable notation in the transport document has been entered.

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\*/ Refer to ST/SG/AC.10/C.3/30, paras. 73-76.

As per para. 1.2.1 Intermediate Bulk Containers (IBCs) are rigid or flexible portable packagings other than those specified in chapter 6.1, that:

- (a) Have a capacity of:
  - (i) not more than 3.0 m<sup>3</sup> (3,000 litres) for solids and liquids of Packing Groups II and III;
  - (ii) not more than 1.5 m<sup>3</sup> for solids of Packing Group I when packed in flexible, rigid plastics, composite, fibreboard and wooden IBCs;
  - (iii) not more than 3.0 m<sup>3</sup> for solids of Packing Group I when packed in metal IBCs;
- (b) Are designed for mechanical handling;
- (c) Are resistant to the stresses produced in handling and transport, as determined by tests.

The quantities are such that it poses real danger. Considering reconditioned and remanufactured packagings, IBCs can also be continued to be shipped to countries having no or partial regulatory regime and in turn continue to be shipped among such countries resulting in an accident, environmental damage, etc. The probability of such IBCs being shipped for disposal in such countries can also not be ruled out. The following modification, therefore, in para. 4.1.2.10 is suggested:

- (a) empty, uncleaned IBCs, only to initial consignee within three months;
- (b) filled IBCs, not exceeding three months after the deadline to allow return of dangerous goods;
- (c) IBCs filled with a substance which must be disposed of or recycled not exceeding six months after the deadline on a suitable notation in the transport document and on approval by the competent authority in the importing country.

It also needs to be considered as to how para. 5.4.1.1.10 “special provisions for empty uncleaned packagings and tanks” requiring such packaging to be transported with the description “empty uncleaned or residue last contained” will be applied. In case of IBCs this paragraph would become redundant.

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