

## 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

### PERFORMANCE OF PACKAGINGS INCLUDING IBCS

Comments on ST/SG/AC.10/C.3/2008/100

Date of manufacture of inner receptacles of composite IBCs

Transmitted by the expert from Germany

1. The expert from Germany has studied the proposal from the International Confederation of Plastics Packaging Manufacturers (ICPP) regarding the marking of inner receptacles of composite IBCs and can support this proposal on principle. However, looking to the given example of the “clock” and realising what are widely-used technical solutions in the blow moulding process this proposal can lead to severe misunderstandings during inspections. Usually the “clock” in the blow mould is constructed in such a manner that the exterior ring indicating the month of manufacture is firmly attached to the blow mould and the inner plate with the pointer or arrow indicating the year of manufacture is a rotating disc. Taking the given example of ICPP and turning notionally the pointer against the “12” as an indication that December is the month of manufacture, the year of manufacture could be read untruly as “80” by any controlling body. In 2010 the year of manufacture could be read as “01” instead of “10” dependent on the position of the pointer, with the consequence that controlling bodies could prosecute the user due to violation of the requirement in 4.1.1.15. Therefore, in our view it is necessary to amend the ICPP proposal in order to avoid such misunderstandings.

2. **Proposal 1:** Amend the proposal of ICPP as follows:

The date of the manufacture of the plastics inner receptacle may alternatively be marked on the inner receptacle in a different place close to the remainder of the marking in such a manner that the meaning of the marking for the date of manufacture is non-interchangeable. As example, an appropriate method is:

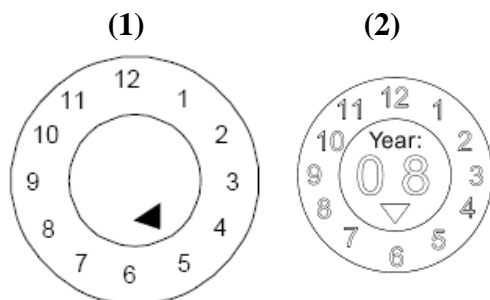


3. The expert from Germany has identified an existing similar provision in 6.1.3.1 (e) for plastics drums and plastics jerricans showing slightly different marking requirements. In contrast to the proposal of ICPP only the month of manufacture may be marked on the packaging in a different place from the remainder of the marking. This optional method should be remained for all cases where this kind of marking is **not close** to the remainder of the UN marking on the packaging (e.g. where the month of manufacture is marked in a different face of small jerricans or bottles than the remainder of the UN marking).

4. Having said that, for the purpose of consistent provisions the expert from Germany is in favour of adding the proposed new optional method marking the year **and** month of manufacture for plastics drums and jerricans, if this marking is in a different place **close** to the remainder of the UN marking.

5. **Proposal 2: Amend** 6.1.3.1 as follows:

- (e) The last two digits of the year during which the packaging was manufactured. Packagings of types 1H and 3H shall also be appropriately marked with the date ~~month~~ of manufacture; this may be marked on the packaging in a different place from the remainder of the marking in such a manner that the meaning of the marking for the date of manufacture is non-interchangeable. ~~As example, An appropriate methods~~ are is:



Using any appropriate method indicating year and month of manufacture (e.g. in accordance with example (2)), the marking of the year of manufacture in the remainder UN-marking may be omitted, provided this marking is close to the remainder of the UN-marking.