



**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-fifth session**

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**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: packagings****Permitted period of use for composite IBCs with plastic inner
receptacle****Transmitted by the expert from Belgium*****Introduction**

1. Paragraph 4.1.1.15 of the Model Regulations specifies for plastics drums, plastics jerricans, rigid plastics IBCs and composite IBCs with plastic inner receptacles the period of use permitted for the transport of dangerous goods. This is 5 years from the date of manufacture of the receptacle, except where a shorter period is prescribed due to the nature of the substance to be transported.
2. In several international and national modal transport regulations this has been translated inconsistently causing two different interpretations concerning the period of use of the composite IBCs with rigid plastic inner receptacles:
 - (a) The 5 years restriction applies to the complete assembled composite IBC, meaning the outer casing and plastic inner receptacle;
 - (b) The 5 years restriction applies only to the rigid plastic inner receptacle of the composite IBC.
3. As explained below, the consequence of the different interpretations may lead to a different permitted period of use, depending on whether the composite IBC is remanufactured or repaired.

* In accordance with the programme of work of the Sub-Committee for 2019-2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

4. Looking at the definition of a remanufactured IBC, it is allowed:
 - (a) to produce a UN-design type IBC from a non-UN design type; or
 - (b) to convert an IBC from one UN-design type to another UN-design type.

This includes, in case of composite IBC's, the replacement of the inner rigid plastic receptacle with a different one while maintaining the outer casing of the composite IBC. The assembled composite IBC is considered as a new design type. This means that the old mark will be removed as specified in 6.5.2.4 of the Model Regulations, a new mark shall be applied as specified in section 6.5.2 of the Model Regulations and that the IBC will be permitted for a period of use of 5 years. The interpretation of current 4.1.1.15 of the Model Regulations with regards to composite IBCs has no influence on the period of use. As such, the outer casing of a remanufactured composite IBC may be used for a period longer than 5 years.

5. The definition for a repaired IBC is different. The replacement of the rigid inner receptacle of a composite IBC with a receptacle conforming to the original design type from the same manufacturer is considered as repair. In this case the original outer casing is maintained. In case of repair, in accordance with paragraph 6.5.4.5.3 of the Model Regulations the original UN design mark, including date of manufacture, is not modified. Only additional durable marks according to 6.5.4.5.3) shall be added on the IBC by the Party performing the tests and inspections after the repair near the manufacturer's UN-design type marks to show:

- (a) The State in which the repair was carried out;
- (b) The name or authorized symbol of the party performing the repair; and
- (c) The date (month and year) of the tests and inspections.

6. Looking at the repair process and taken into consideration the interpretation that the 5 years limit applies to the complete IBC, as described in paragraph 2 of this document, the period of use of a repaired composite IBC with a new original rigid inner receptacle may only be used for a period equal to 5 years minus the lifetime already passed. As such, the outer casing is also not used for a period longer than 5 years.

7. This may lead to an inconsistent and illogical approach of repaired IBCs versus remanufactured IBCs where the same outer casing may be allowed for a different period of use due to a different interpretation. Moreover, both remanufactured and repaired composite IBCs are subject to the same inspections with regards to the outer conditions (which includes the outer casing) and the proper functioning of the service equipment at intervals of 2.5 years as specified in 6.5.4.4 of the Model Regulations.

8. To solve the problem and to remove the inconsistencies caused by different interpretations and translations we propose to add a note to 4.1.1.15 of the Model Regulations clarifying that for composite IBCs the period of use refers to the date of manufacture of the inner receptacle.

Proposal

9. Add a new note (underlined) to paragraph 4.1.1.15 of the Model Regulations:

“For plastics drums and jerricans, rigid plastics IBCs and composite IBCs with plastics inner receptacles, unless otherwise approved by the competent authority, the period of use permitted for the carriage of dangerous substances shall be five years from the date of manufacture of the receptacles, except where a shorter period of use is prescribed because of the nature of the substance to be carried.

Note: for composite IBCs the period of use refers to the date of manufacture of the inner receptacle.”