

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the

Working Party on the Transport of Dangerous Goods

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Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN:

New proposals

30 January 2022

Transitional measure for inner receptacles of composite Intermediate Bulk Containers (IBCs)

Transmitted by the Government of the Netherlands

Introduction

1. Provision 6.5.2.2.4 in RID/ADR 2021 has been amended due to the implementation of the 21st edition of the UN Recommendations for the Transport of Dangerous Goods (Model Regulations) into RID/ADR.

2. The relevant part from provision 6.5.2.2.4 in RID/ADR 2021 which is related to this issue is given below and the new wordings are underlined.

“Inner receptacles that are of composite IBC design type shall be identified by the application of the marks indicated in 6.5.2.1.1 (b), (c), (d) where this date is that of the manufacture of the plastics inner receptacle, (e) and (f). The UN packaging symbol shall not be applied. The marks shall be applied in the sequence shown in 6.5.2.1.1. They shall be durable, legible and placed in a location so as to be readily accessible for inspection after assembling the inner receptacle in the outer casing. When the marks on the inner receptacle are not readily accessible for inspection due to the design of the outer casing, a duplicate of the required marks on the inner receptacle shall be placed on the outer casing preceded by the wording "Inner receptacle". This duplicate shall be durable, legible and placed in a location so as to be readily accessible for inspection.”

These underlined phrases replace the sentence *“It shall be durable, legible, and placed in a location so as to be readily visible when the inner receptacle is placed in the outer casing.”* in the previous provision 6.5.2.2.4 of RID/ADR 2019.

3. It seems that certain types of composite IBCs with plastics inner receptacles are in circulation which were manufactured and approved according to RID/ADR 2019 or previous versions, but they can't fulfil the new requirements of provision 6.5.2.2.4 of RID/ADR 2021. This is the case for inner receptacles where the marks on the inner receptacle are not readily accessible for inspection due to the design of the outer casing.

4. At least in the Netherlands there are many composite IBCs with plastics inner receptacles (code 31HH1) on the market which were manufactured in the Netherlands. These plastics inner receptacles for composite IBCs are not in line with 6.5.2.2.4 RID/ADR 2021, and therefore they may no longer be used for the carriage of dangerous goods. However, these inner receptacles are in compliance with the other requirements of RID/ADR 2021.

5. Unfortunately, a transitional measure to allow the use of these plastics inner receptacles for composite IBCs is missing in RID/ADR 2021. It was probably overlooked during the harmonisation of the 21st edition of the Model Regulations with RID/ADR.

6. It is relevant to note that prolongation of the use of these composite IBCs with plastics inner receptacles does not lead to a safety obstruction. Also, provision 4.1.1.15 of RID/ADR permits the use of these approved inner receptacles for a period of five years from the date of manufacture or for a shorter period due to the nature of the substance to be carried.

7. In order to continue the use of the approved composite IBCs with these plastics inner receptacles, it is proposed to include a transitional measure in Chapter 1.6 of RID/ADR for inner receptacles of composite IBCs.

Proposal

8. Add in Chapter 1.6 of RID/ADR the following new sub-section to read:

“1.6.1.x “Inner receptacles of composite IBCs manufactured before 1 July 2021 in accordance with the requirements of 6.5.2.2.4 in force up to 31 December 2020 and which are not in accordance with the requirements of 6.5.2.2.4 regarding the marks on the inner receptacles that are not readily accessible for inspection due to the design of the outer casing applicable as from 1 January 2021 may continue be used until the end of their period of use determined in 4.1.1.15.”

Justification

9. This transitional measure enables the continuation of the use of the approved inner receptacles for composite IBCs and ensures the safe transport of dangerous substances in this type of composite IBCs. It also avoids unnecessary administrative and economic burdens, prevents unnecessary environmental impact (waste, destruction of packaging, etc.) and has benefits from sustainability point of view.
