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**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**

Geneva, 19-29 September 2023

Item 6 of the provisional agenda

**Interpretation of RID/ADR/ADN****Approval of modified intermediate bulk containers****Transmitted by the Government of the Netherlands\* \*\*****Introduction**

1. In the Netherlands inspections have indicated that modified Intermediate Bulk Containers (IBCs) are in use. These modifications do not conform to the design type, on which the approval of the original IBCs is based. It was questioned if additional (design type) tests are required for these modified IBCs for approval and certification and if these modified IBCs should be subject to initial and periodic inspection and tests.
2. An example of a modification that was made to IBCs is that couplings have been fitted to the top of the IBC in the manhole cover to connect a pressure hose for a pump or generator. These connections were not on the drawings of the original design type and were fitted afterwards by the user.
3. The manufacturer of these IBCs indicated that they never install such couplings in the manhole cover of these IBCs. It appears that these IBCs were not reassessed after having been modified and that no (supplementary or initial) inspections were performed. In these specific cases no approval was given on the materials used or the welding programme and no hydraulic pressure test was carried out. It seems that the IBCs were subsequently tested several times periodically after the modification under 6.5.4.4.
4. Our understanding is that these modified IBCs do not meet the definition of repaired IBC (6.5.4.5) nor the definition of routine maintenance of rigid IBC (1.2.1), but it does meet the definition of remanufactured IBC (1.2.1).
5. According to 1.2.1 remanufactured IBCs are subject to the same requirements of ADR that apply to new IBCs of the same type (see also design type definition in 6.5.6.1.1).

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\* A/77/6 (Sect. 20), table 20.6.

\*\* Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2023/31.



6. In our view a modified IBC is in fact a remanufactured IBC and should be subjected to a full test according to 6.5.6.3.7 that apply to new IBCs of the same type to get a new approval, certification and mark.

## **Request**

7. The Dutch delegation is interested to hear the opinions of other delegations on this issue or whether they can endorse the analysis and point of view in paragraph 6 and invites the Joint Meeting to act, as it deems appropriate.

## **Justification**

8. The aim of this document is to facilitate the clarification in RID/ADR on the use of modified IBCs and to prevent unsafe situations during the transport of dangerous goods in such IBCs.

9. Ensuring a more systematic approach and a better rationale in RID/ADR helps to develop clearer legal texts and avoid different criteria among different Contracting Parties/States and inspection services, and thus helps to implement the United Nations Sustainable Development Goal number 16: Peace, justice and strong institutions.

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