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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Fifteenth session,
Geneva, 29 June-10 July 1998,
agenda item 3 (b))

PACKAGINGS AND IBCS

Packaging and IBC matters

Miscellaneous changes

Transmitted by the International Council of
Intermediate Bulk Container Associations (ICIBCA)

1. Composite IBCs: Marking of detachable parts

Background

1. Paragraph 6.5.2.2.4 was adopted by the Committee of Experts at its Eighteenth Session in December 1994 (see ST/SG/AC.10/21, paragraphs 113 to 115, and Annex 3), on the basis of proposals contained in document INF.21 submitted by the United Kingdom. This document related solely to the Composite IBC with flexible plastics inner receptacle, for liquids (type 31HZ2). It proposed certain additional requirements intended to take account of various concerns raised by modal organizations about the 31HZ2 IBC.

2. When a 31HZ2 IBC is being returned “empty” to the original consignor for reuse, it is the practice to remove and dispose of the inner receptacle, and dismantle or fold the outer casing so that it occupies a much smaller volume during transport. Concerns were expressed that, because the outer casing of such units was specifically designed and intended to be dismantled in the course of its normal use, parts from different IBC design types could be inadvertently used when a unit is subsequently being reassembled for filling and reuse. The Committee agreed to provide for the marking of “detachable” parts of composite IBC outer casings in order to ensure that only parts from the same IBC design type were used in the reassembly of the unit for further use.

3. In practice, the outer casings of most composite IBC are not routinely disassembled, although they may contain parts that are “detachable” (such as fasteners). This is particularly the case for composite IBC with rigid plastics inner receptacles (type 31HZ1).

4. Parts that may be “detachable” include a variety of items, many of which are quite small (e.g. nuts, bolts, screws and other fasteners). Thus, each of these items should be marked with “the month and year of manufacture and the name of the manufacturer and any other identification of the IBC as specified by the competent authority”. Applying these markings to such items is not only impractical, but, in the opinion of ICIBCA, unnecessary for most composite IBC in that such items would never be “detached” from the outer casing in the normal course of transport and use of the IBC.

5. Therefore, ICIBCA believes that the intent of the Committee in adopting 6.5.2.2.4 was to require the marking of detachable parts of composite IBC outer casings *only* when the outer casing is designed and intended to be routinely dismantled in the course of its normal transport and use. Accordingly, ICIBCA proposes that 6.5.2.2.4 be amended to convey this intent clearly.

Proposal

For the reasons offered above, it is proposed to amend 6.5.2.2.4 to read:

“Where a composite IBC is designed in such a manner that the outer casing is intended to be dismantled for transport when empty (such as for return of the IBC for reuse to the original consignor), each of the parts intended to be detached when so dismantled shall be marked with the month and year of manufacture and the name or symbol of the manufacturer and other identification of the IBC as specified by the competent authority (6.5.2.1.1(f))”.

2. Clarity of marking

Background

Unlike the requirement for other packagings, no minimum size is prescribed in paragraph 6.5.2.1.1 for the digits of the UN mark for IBCs. ICIBCA is aware that some markings are unrealistically small for the size of the particular IBC. The following proposal accords with the requirements in 6.1.3.1 for packages with a gross mass of more than 30kg.

Proposal

Amend the first sentence of paragraph 6.5.2.1.1 to read as follows:

“Each IBC intended for use according to these Regulations shall bear markings which are durable, legible and placed in a location as to be readily visible. Letters, numerals and symbols shall be at least 12mm high and shall show: ”

3. Designatory code system for IBCs

Background

In the table in paragraph 6.5.1.4.1 (a) the heading states “For solids, discharged”. The text in paragraph 6.5.1.4.3 states on eighteen occasions “For solids, loaded or discharged.....” The following proposal aligns the heading in the table in paragraph 6.5.1.4.1 (a) with the text in paragraph 6.5.1.4.3.

Proposal

Amend the heading in the table in 6.5.1.4.1 (a) to read:

“For solids, loaded or discharged”
