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**COMMITTEE OF EXPERTS ON THE TRANSPORT
OF DANGEROUS GOODS**

(Twenty-first session,
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agenda item 2 (b))

**WORK OF THE SUB-COMMITTEE OF EXPERTS
ON THE TRANSPORT OF DANGEROUS GOODS**

Draft amendments to the Recommendations on the Transport of Dangerous Goods

Packagings

**Comments on Proposals from the Expert from Belgium on Remanufacturing,
Repair, and Routine Maintenance of IBCs (ST/SG/AC.10/2000/5)**

**Transmitted by the International Confederation of Container Reconditioners (ICCR),
the International Confederation of Plastics Packaging Manufacturers (ICPP),
the International Council of Intermediate Bulk Container Associations (ICIBCA)
and the International Council of Chemical Associations (ICCA)**

Document ST/SG/AC.10/2000/5 from Belgium proposes changes to the text concerning the "Remanufacturing, repair, and routine maintenance of IBCs," that had been adopted by a clear majority by the Sub-Committee in its 18th session. The present paper is a comment on the Belgian proposals, offered by the four industrial associations involved with this subject in July.

The joint industry proposal in July was the result of a three-month period of preparation, including a two-day meeting in Bad Homburg, Germany, in March 2000. It involved intensive work by more than 20 experts from America and Europe, and has the full support of the broad membership of these industrial associations.

With the exception of UN/SCETDG/18/INF.19 (United Kingdom), no written comments were submitted on this subject. As stated in the report of the 18th session (see point 89), UN/SCETDG/18/INF.66 was the product of a working group formed during the July session to review and respond to the comments made by the Experts.

1. *Definitions.* The industry groups do not agree to any changes to the editorial arrangement of the definitions, as proposed by Belgium.

2. *Last sentence in definition of "Repaired IBCs".* The concerned industry and the UN Sub-Committee agree that the bodies of rigid plastics IBCs and the inner receptacles of composite IBCs must not be repaired. Implementation of this consensus, which is fundamental to transport safety, is adequately expressed in the sentence: "The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs are not repairable." This is very clear and we oppose changing it.

3. *Marking after routine maintenance.* The proposal from Belgium to delete "cleaning without any change of ownership" from the requirements for marking is not relevant, because this language does not exist in the text adopted by the Sub-Committee. According to the definitions, cleaning is part of "routine maintenance." If it performed by the owner or on behalf of the owner of the IBC, no additional marking is required.

Representatives of reconditioning firms who perform IBC cleaning operations and would be required to apply these marks have participated in these discussions and have not expressed objections to the marking requirement as adopted by the Sub-Committee. In addition, these reconditioners confirm that cleaning operations occur more often in closed-loop systems without a change of ownership, and where separate marking after each operation would not be required.

4. *Replace "structure" with "structural equipment."* We do not support this proposal. The word "structure" in 6.5.1.6.5 has been in the text of the regulations for some time. It was not added in the July session.

5. *Marking by the party "performing the test and inspections."* This Belgian proposal also is not acceptable to the industry associations. The objective of the procedure is to facilitate identification for the competent authority of the party responsible for proper repair and routine maintenance of IBCs. It is far more important to identify this party, than another party who might perform tests afterward.
