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**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

Twenty-fifth session, 5-14 July 2004
Item 4 (c) of the provisional agenda

PACKAGINGS (INCLUDING IBC'S AND LARGE PACKAGINGS)

Miscellaneous proposals

Marking of IBCs after inspection and repair

Transmitted by the expert from the Netherlands

Introduction

1. Paragraph 6.5.1.6 of the UN Recommendations on the Transport of Dangerous Goods gives provisions for the inspection and repair of IBCs. After repair of a rigid IBC it is required that the IBC is subjected to the testing and inspection requirements which correspond to the testing and inspection requirements after 5 years. Both after the regular inspections (after two and a half and five years) and the inspections after having done the repair it is required that the IBC is marked (6.5.2.2 and 6.5.1.6.6.2). However, the marking requirements are not the same: after the regular inspections the marking should be the date (month and year) of the last leakproofness test, if applicable and the date (month and year) of the last inspection, while after repair it is required that the marking should contain the State in which the repair was carried out, the name or authorized symbol of the party performing the repair and the date (month and year) of the tests and inspections.

2. These different marking requirements could lead to confusion and it would be beneficial to reach harmonization. Further it is important e.g. for enforcement purposes to have information concerning the party which has performed the regular inspections. It is thus proposed to make the marking requirements the same, i.e. as required after repair (State, Party performing repair and date).

3. It is further proposed to combine the marking requirements for the last leakproofness test and the last inspection, as an inspection is carried out together with the performance of a leakproofness test (if applicable).

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It is also proposed to clarify the marking requirements for repair, so that this marking will be placed at the additional marking (6.5.2.2.1).

Proposal

4. Replace in the table of 6.5.2.2.1 “Date of last leakproofness test, if applicable (month and year)” and “Date of last inspection (month and year)” by:

“Last inspection (and leakproofness test, if applicable): the State in which the last inspection was carried out, the name or authorized symbol of the Party performing the inspection and the date (month and year) of the last inspection”

Replace the first sentence in 6.5.1.6.6.2 by: “The Party performing the repair shall durably mark the IBC at the additional marking (6.5.2.2.1) with the wording “Repair” to show:”

Action requested from the Sub-Committee:

5. The Sub-Committee is invited to consider the proposals and take action as deemed appropriate.
