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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

Fifty-fourth session

Geneva, 26 November-4 December 2018 Item 2 (c) of the provisional agenda Recommendations made by the Sub-Committee on its fifty-first, fifty-second and fifty-third sessions and pending issues: listing, classification and packing

Composite Intermediate Bulk Containers (IBCs): inner receptacle marking

Transmitted by the expert from Belgium*

Introduction

1. During the fifty-third session document ST/SG/AC.10/C.3/2018/45 was presented to clarify the intent of the last sentence of the first paragraph of 6.5.2.2.4:

"The inner receptacle of composite IBCs 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. 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."

- 2. The question was raised if the mark should only be visible during the assembling or also after the inner receptacle is placed in the outer casing. The Sub-Committee confirmed that the marks shall be readily visible also after the assembling of the inner receptacle in the outer casing. For that reason, the original proposal was not accepted.
- 3. Based on the comments received the following alternative proposal is presented:

^{*} In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14).

Proposal

4. Amend the first paragraph of 6.5.2.2.4 to read as follows: (<u>new text underlined</u>, deleted text stricken trough)

"6.5.2.2.4 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. It shall be durable, legible and placed in an <u>accessible</u> location so as to be readily visible <u>at any time during and after assembling when</u> the inner receptacle is placed in the outer casing."