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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-first session, 1-10 July 2002,
agenda item 6 (b))

PACKAGINGS (INCLUDING IBCs AND LARGE PACKAGINGS)

Miscellaneous proposals

Transport of UN 1408 in IBCs

Transmitted by the experts from the Netherlands and Norway

Introduction

For the transport of *FERROSILICON with 30% or more but less than 90% silicon*, UN 1408, Class 4.3, PG III in IBCs the IBC packing instruction **IBC08**, including special packaging provision **B4** is applicable. This IBC packing instruction **IBC08 – B4** has been implemented in both ADR , 1 July 2002 amendments and IMDG Code, amendment 30-00.

In the packaging requirements for both the packagings and IBCs for UN 1408 in the ADR , 1 January 1999 amendments and IMDG Code, amendment 29-98 an exemption existed with regard to packaging performance tests referred to in ADR marginal 3500 (1), (2) and (5) to (7) and IMDG Code in sections 10 and 26 of the General Introduction and in Annex I to the IMDG Code. The reason for this exemption was the low degree of hazard of this product.

In the packaging instruction P003 for UN 1408 this exemption can be found in special provision PP20. PP20 indicates that any siftproof, tearproof receptacle may be used for the transport of UN 1408.

As this product is shipped in considerable quantities in IBCs, especially flexible IBCs, the exclusion of this exemption for IBCs give a major problem to the concerned industry in the multimodal transport of this product. In the land-mode UN 1408 still can be transported in accordance with the provisions of ADR , 1 January 1999 amendments, which allows non-tested IBCs. However such a transport has to comply for the sea-mode with the provisions of the IMDG Code, Amdt. 30-00, which do not allow non-tested IBCs.

Currently several hundreds of non-tested IBCs containing UN 1408 in transit are temporary stocked in Dutch ports due to this, in the view of the Netherlands, omission.

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Proposal

To solve this omission the Netherlands propose to change special packing provisions **B6** of IBC packing instruction IBC08 in this respect and to add the amended special packing provisions **B6** to column (9) of Dangerous Goods List for UN 1408, PG III.

Amendment to B6;

B6 For UN Nos. 1327, 1363, 1364, 1365, 1386, **1408**, 1841, 2211, 2217, 2793 and 3314, IBCs are not required to meet the IBC testing requirements of Chapter 6.5.

Amendment to the DGL for UN 1408, PG III;

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
1408	<i>FERROSILICON with 30% or more but less than 90% silicon</i>	4.3	6.1	III	39 223	1 kg	P003 IBC08	PP20 B4, B6		

This proposal allows the continuation of the transport of *FERROSILICON with 30% or more but less than 90% silicon* in non-tested IBCs.
