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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-third session, 30 juin-4 July 2003 Agenda item 4(c))

PACKAGINGS

Miscellaneous proposals

New Requirements for rigid plastic (H) IBC's and Composite IBC's (HZ)

Transmitted by the expert from Spain

It seems that many single-trip rigid plastic IBC's (H) and composite IBC's with plastic inner receptacle (HZ) units are used in multi-trip applications.

This practice cuts cost, but diminish safety of IBC's, opening the IBC's user up to a regulatory minefield should the unit fail. Without being able to guarantee a single-trip IBC's for reuse, manufacturers leave users open to penalty.

Obviously the most weak construction of the single-trip IBC's (H) and (HZ), because of his intended use only for one transport operation (even if they pass the required tests in 6.5.4.3.5), compared with the more robust construction of a multi-trip IBC's (H) and (HZ), has by consequence produced a competition between the two general referred types (single-trip or multi-trip) of IBC's (H) and (HZ).

For the above reasons, the expert from Spain would like to ask the Sub-committee whether it should be convenient or not to deal with this matter, by implementing an instrument which will not allow the use of single-trip IBC's (H) and (HZ) as multi-trip.