

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
Geneva, 5-14 July 2004
Item 4 (c) of the provisional agenda

PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)

Miscellaneous proposals

Repair of IBC's

Transmitted by the International Confederation of Plastics Packagings Manufacturers (ICPP)

1. With paper ST/SG/AC.10/C.3/2004/38 the expert from The Netherlands proposes to change the definition of repair of IBC's especially for rigid metal IBC's that "the replacement of bottom closures of rigid metal IBC's by closures of other than the original manufacturer's specifications is considered repair under the condition that the alternative closure is identifiable, and does not have a negative influence on the performance of the IBC".
 2. Representatives of four international associations representing the IBC manufacturing, chemical and reconditioning industry, agreed during the Bad Homburg meeting on a common proposal for the introduction of definitions and recommendations on the remanufacturing, repair and routine maintenance of IBC's, which were adopted with slight modifications by the UN Sub-Committee in December 2000.
In the course of the intensive talks between the representatives from all participating industrial organizations, agreement was achieved that both for repair and routine maintenance, the replacement of closures or service equipment has always to be in line with the original manufacturer's specifications. This is explicit in the definition of routine maintenance for rigid IBC's, stating under (b): "removal and reinstallation or replacement of body closures including associated gaskets or service equipment conforming to the original manufacturer's specification, provided that the leak tightness of the IBC is verified."
Consequently the proposal from The Netherlands should have included a modification also of the definition of "routine maintenance", because it is inconsistent to claim relaxation of the conditions for "repair" but not for "routine maintenance".
 3. The concerned industry abstained from relaxations concerning the criterion "original manufacturers specification" for all types of rigid IBC's to have consistent, clear and enforceable regulations which strengthen the design type approach and guarantee a high degree of safety after repair and routine maintenance of IBC's.
 4. Exceptions for the replacement of closures or service equipment are also imaginable for rigid plastic IBC's or composite IBC's. For the same reasons ICPP would be critical regarding similar proposals for rigid plastics or composite IBC's.
 5. ICPP asks the Sub-Committee to take the above mentioned arguments into account before taking a decision.
-