

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 IBC'S AND LARGE PACKAGINGS)

Comments on ST/SG/AC.10/C.3/2004/39 (Netherlands)

Transmitted by the expert from Belgium

Introduction

The expert from Belgium agrees in principle with the proposal of the expert from the Netherlands, contained in ST/SG/AC.10/C.3/2004/39. However, the proposed new texts could lead to confusion on what exactly is to be marked on the repaired IBC, and whether only an inspection has been carried out or an inspection and a leakproofness test. Moreover, they create the following contradiction between 6.5.1.6.6.2 and 6.5.2.2.1:

- according to the proposed 6.5.1.6.6.2 (c), “The party **performing the repair** shall durably mark the IBC ...to show: ... (c) the date (month and year) of the tests and inspections.”;
- according to the proposed 6.5.2.2.1, each IBC shall bear “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.”. These three markings will be applied by the Party **performing the inspection and leakproofness test** (if applicable).

This could lead to the conclusion that, after repair, the date of the tests and inspections have to be applied twice, by two different parties.

Proposals

1. Replace 6.5.1.6.6.2 by:

« 6.5.1.6.6.2 The Party performing the repair shall durably mark the IBC at the same place as the additional marking of 6.5.2.2.2, to show:

- (a) the word “REPAIR”;
- (b) the State in which the repair was carried out, indicated by the distinguishing sign for motor vehicles in international traffic ; and
- (c) the name or authorised symbol of the Party performing the repair. »

2. 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: “ or, if applicable, “ Last inspection and leakproofness test: “, followed by the distinguishing sign for motor vehicles in international traffic of the State in which the last inspection (and leakproofness test, if applicable) was carried out, the name or authorised symbol of the Party performing this inspection (and leakproofness test, if applicable) and the date (month and year) of this inspection (and leakproofness test, if applicable)».
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