

## 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

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### PACKAGINGS (INCLUDING IBC's AND LARGE PACKAGINGS)

Evaluation of the United Nations packaging requirements,  
Initial testing and re-inspecting

Transmitted by the expert from Germany

#### **Introduction**

The requirements on the initial testing of packagings and IBC and on the re-inspection of IBC are laid down in four different places in the UN Model Regulations causing repeated difficulties in understanding.

- Part 4, addressed to the user of packagings, including IBC and Large Packagings requires in 4.1.1.12 an initial testing of every manufactured item before being used and after remanufacturing etc.;
- Part 6, addressed to the manufacturer of packagings including IBC and Large Packagings, requires in 6.1.1.3 with the same words that an initial testing of any manufactured packing shall be performed before being used and after remanufacturing etc.;
- Part 6, requires in 6.5.1.6.4 again, that certain types of IBC shall initially be inspected and thereafter at intervals not exceeding five and two and a half years;
- Part 6, additionally requires in 6.5.4.14, that the leak-tightness of these types of IBC shall be tested initially and at intervals not exceeding two and a half years.

#### **Proposal:**

Its proposed to re-allocate the requirements to the relevant Parts as intended by the reformatting of the Model Regulations and to eliminate duplication. As a result, the duty to care about re-inspection is kept in Part 4. The need to perform initial tests/inspections, re-inspections and test procedures are concentrated in Part 6 (but not as part of the design type test procedure). The revised text is proposed to read as follows:

#### **Part 4:**

~~4.1.1.12 Every packaging, including IBCs, intended to contain liquids shall successfully undergo a suitable leakproofness test, and be capable of meeting the appropriate test level indicated in 6.1.5.4.3, or 6.5.4.7 for the various types of IBCs:~~

~~(a) before it is first used for transport;~~

~~Every metal, rigid plastic and composite IBC for liquids, or for solids which are filled or discharged under pressure shall be inspected and tested to the satisfaction of the competent authority in accordance with 6.5.1.6.4.(b) and (c).~~

~~(b) after remanufacturing or reconditioning of any packaging, before it is re-used for transport;~~

~~(c) after the repair or remanufacture of any IBC, before it is re-used for transport.~~

~~For this test the packaging, or IBC, need not have its closures fitted. The inner receptacle of a composite packaging or IBC may be tested without the outer packaging, provided the test results are not affected. This test is not necessary for inner packagings of combination packagings or large packagings. A report of each inspection shall be kept by the owner of the IBC at least until the next inspection. The report shall include the results of the inspection and shall identify the party performing the inspection (see also the marking requirements in 6.5.2.2.1).~~

**Part 6:**

**6.1.1.3** (Text unchanged)

**6.5.1.6.4** *Inspection and testing:*

~~Every metal, rigid plastics and composite IBC for liquids, or for solids which are filled or discharged under pressure shall, to the satisfaction of the competent authority~~

~~(a) be subjected, as an initial test (i.e. before the IBC is first used for carriage), every metal, rigid plastics and composite IBCs shall to the leakproofness test and be capable of meeting the appropriate test level of 6.5.4.7.3. For this test the IBC, need not have its closures fitted. The inner receptacle of a composite packaging or IBC may be tested without the outer packaging, provided the test results are not affected. In addition, it shall be inspected to the satisfaction of the competent authority:~~

~~(a) Before it is put into service, and thereafter at intervals not exceeding five years, with regard to:~~

- ~~(i) conformity to design type including marking;~~
- ~~(ii) internal and external condition;~~
- ~~(iii) proper functioning of service equipment;~~

~~Thermal insulation, if any, need not be removed fitted only to the extent necessary for a proper examination of to the body of the IBC;~~

~~(b) be subjected; at intervals of not more than two and a half years and after routine maintenance (if the leaktightness of the IBC was affected) to the leakproofness test as specified in (a). In addition it shall, at intervals of not more than two and a half years, be inspected At intervals of not more than two and a half years, with regard to:~~

- ~~(i) external condition;~~
- ~~(ii) proper functioning of service equipment;~~

~~Thermal insulation, if any, need be removed only to the extent necessary for a proper examination of the body of the IBC;~~

~~(c) be inspected, at intervals of not more than 5 years -with regard to:~~

- ~~(i) conformity to design type including marking;~~
- ~~(ii) internal and external condition;~~
- ~~(iii) proper functioning of service equipment;~~

~~Thermal insulation, if any, need be removed only to the extent necessary for a proper examination of the body of the IBC;~~

A report of each inspection shall be kept by the owner of the IBC at least until the next inspection. The report shall include the results of the inspection and shall identify the party performing the inspection (see also the marking requirements in 6.5.2.2.1).

6.5.1.6.6.1 Amend numbering into 6.5.1.6.5.1 under renumbered heading 6.5.1.6.5 *Repaired IBCs*.  
Renumber subparagraphs and reference in 6.5.1.6.6.3 accordingly.

6.5.1.6.5.2 (old 6.5.1.6.6.1) Amend text as follows:

~~In addition to any other testing and inspection requirements in these Regulations~~After repair, an IBC shall be subjected to the full testing and inspection requirements set out in ~~6.5.4.14.3 and~~ 6.5.1.6.4 (a), and the required reports shall be prepared, whenever it is repaired.

6.5.4.14.3 deleted

**Justification**

The proposed amendments do not change the contents of the Model Regulation. It would remove duplication , simplify the structure and improve the understanding and observation of the requirements.

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