

**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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Item 4 (c) of the provisional agenda

PACKAGINGS(INCLUDING IBCS AND LARGE PACKAGINGS)

Bottom Lift test for IBC's

Transmitted by the International Confederation of Intermediate Bulk Container Associations (ICIBCA)

At the December 2005 session, the Sub-Committee was asked and is considering changes to paragraph 6.5.4 Bottom Lift Test and specifically paragraph 6.5.4.4.4 Criteria for Passing.

- (1) Data from the only formal Incident Reporting System from the US Department of Transportation indicates that there were no dangerous goods incidents in 2004 that were attributable to Bottom Lift failures. This level of performance was measured against in excess of two (2) million IBC's used in US transport during the same year.
- (2) The introduction of new criteria, "Observable" permanent deformation is ambiguous and in addition to being too subjective in interpretation will not only be injurious to the worldwide IBC manufacturers but is totally unnecessary. We could consider a small dent or crease on one of the top bars in a 31 HA 1 composite IBC to be "an observable permanent deformation" This would then be a cause for test failure despite the fact that the IBC would be safe for transport.

We strongly urge the Sub-Committee to leave the Criteria for Passing in 6.5.4.4.4 as it currently exists "No permanent deformation which renders the IBC, including the base pallet, if any, unsafe for transport and no loss of contents."
