

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

15 November 2017

Fifty-second session

Geneva, 27 November-6 December 2017

Item 6 (b) of the provisional agenda

**Miscellaneous proposals for amendments to the
Model Regulations on the Transport of Dangerous Goods:
packagings**

Comments on ST/SG/AC.10/C.3/2017/31; Additional marking of the maximum stacking load of IBC

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

Introduction

1. ICPP supports the proposal of the expert from Germany to clarify the Model Regulations with regard to marking of the maximum permitted stacking load by amending the footnote in 6.5.2.2.1.
2. The proposed footnote makes reference to 6.5.2.2.2. If the Sub-Committee is now dealing with the marking of the maximum stacking load in conjunction with the proposal by Germany, ICPP deems it appropriate to use this opportunity for fine tuning the first sentence of 6.5.2.2.2.
3. The first sentence of 6.5.2.2.2 reads as follows: “The maximum permitted stacking load applicable when the IBC is in use shall be displayed on a symbol as shown in Figure 6.5.1 or Figure 6.5.2.” The phrase “in use” in conjunction with stacking of IBCs has been occasionally misinterpreted in practice, the restriction for stacking of IBCs displayed on the symbol would be also relevant for non-transport activities of IBCs, e.g. warehousing. To reduce such misinterpretations in future, ICPP proposes to replace the phrase “in use” by “being transported”.

Proposal

4. Amend the first sentence of 6.5.2.2.2 to read as follows: “The maximum permitted stacking load applicable when the IBC is **being transported** shall be displayed on a symbol as shown in Figure 6.5.1 or Figure 6.5.2.”
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