

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 3 of the provisional agenda

Listing, classification and packing

Comments on ST/SG/AC.10/C.3/2017/36 and UN/SCETDG/52/INF.23; Multiple marking of packagings, including IBCs and large packagings, indicating conformity with more than one successfully tested design type

Transmitted by the International Confederation of Container Reconditioners (ICCR)

1. ICCR has reviewed the proposals by DGAC and CEFIC, and ICIBCA, regarding the use of multiple markings on packagings, including IBCs and large packagings. We support the use of multiple markings in principle and believe the practice to be beneficial and safe. Both proposals make important contributions towards a sensible resolution of this matter. ICCR appreciates the opportunity to provide its comments to the Sub-Committee.
2. Like CEFIC, ICCR believes the Model Regulations do not prohibit the application by a manufacturer (or remanufacturer) of more than one full marking on a packaging. As noted by ICIBCA, this practice is currently authorized in the United States and there is no evidence there of any safety problems.
3. However, ICCR recognizes that some governments may take the position that if a practice is not specifically authorized in the Model Regulations, it is not allowed. Consequently, it may be the case that one or more governments may prohibit manufacturers from placing multiple markings on packagings, or they may direct enforcement authorities to question and, thereby, frustrate shipments of packagings that bear multiple markings. The DGAC paper suggests such uncertainty does, in fact, exist. Therefore, ICCR supports efforts to resolve this problem.
4. Additionally, we believe the CEFIC/DGAC proposal properly identifies an actual marking/transport problem, which relates to the transportation of some substances that are loaded in one state and, in transit, may change state (e.g. loaded as a liquid and become solid).
5. ICCR believes a reasonable solution to this problem is to add a new sub-paragraph 4.1.1.3.1 that reads much like the ICIBCA proposal. Our proposal makes minor editorial revisions to the ICIBCA language.

6. ICCR proposes the following modification of the aforementioned marking proposals:

“4.1.1.3.1 When a packaging conforms to more than one tested design type, the packaging may bear more than one complete marking. When more than one mark is applied to a packaging, including IBCs and large packagings, the markings must be readily visible and appear near one another.”
