

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

28 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

Additional marking of the maximum stacking load of IBC – Revision of 2017/31

Transmitted by the expert from Germany

Introduction

1. The expert from Germany became aware of different interpretations of the requirement to mark the maximum permitted stacking load on IBCs and presented informal document INF.14 at the last session.
2. The maximum permitted stacking load is mentioned in two places, in 6.5.2.2.1 and in 6.5.2.2.2. This aroused a discussion as to whether the sole indication of the maximum permitted stacking load on the pictogram (6.5.2.2.2) is sufficient, or whether there shall be marking for the second time as part of the additional marks in accordance with 6.5.2.2.1.
3. The issue of marking IBCs with the maximum stacking load was considered by the informal working group on IBCs held in Paris in October 2005 (see informal document INF.5, twenty-eight session) and during the subsequent Sub-Committee session in December 2005. The Sub-Committee agreed in principle that the marking with the stacking test load in the UN string in accordance with 6.5.2.1.1 (g) should remain unchanged, but that IBCs should additionally be marked with the maximum permitted stacking load. The current provisions were finally adopted at the twenty-ninth session of the Sub-Committee on the basis of document ST/SG/AC.10/C.3/2006/30
4. It becomes clear against the background of the discussions in 2005 and 2006 that the intention was to introduce the mark as a single mark that has to be displayed on the pictogram only.
5. However, the wording of the Model Regulations is not sufficient clear. The Model Regulations do not explicitly state that the specification is sufficient only within the symbol. The additional marks in accordance with 6.5.2.2.1 may be placed on a corrosion-resistant plate fixed in a readily accessible place. In 6.5.2.2.2 the information shall be displayed on a symbol but it does not refer to the former plate - suggesting that there are two signs, which logically have to be identical. Also the double transitional provisions in 6.5.2.2.1, footnote b and in the comment on 6.5.2.2.2 suggest that there are two parallel requirements.

6. The Sub-Committee agreed that the current provisions should be clarified to avoid the interpretation that the maximum permitted stacking load is required to be marked both on a metal plate as it could be understood from 6.5.2.2.1 and on the pictogram described in 6.5.2.2.2, when this mark is in fact only required in the pictogram (see ST/SG/AC.10/C.3/102, paras 71-72).

Proposal

7. Amend 6.5.2.2.1 as follows:

In the table, delete the last line and delete the corresponding footnote b.
