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**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****Fifty-third session**

Geneva, 25 June-4 July 2018

Item 6 (b) of the provisional agenda

**Miscellaneous proposals for amendments to the****Model Regulations on the Transport of Dangerous Goods:  
packagings****Routine maintenance of IBCs – Requirements****Transmitted by the expert from Belgium\*****Introduction**

1. During the fifty-second session informal document INF.17 was presented to discuss some proposed amendments to the requirements for routine maintenance of IBCs. Based on the comments received during the meeting and after consultation with the industry a formal proposal has been made.
2. Most owners and fillers of IBCs are using third party companies for routine maintenance of the IBC's (external/internal).
3. Currently the definitions in Chapter 1.2 of the Model Regulations, considered routine maintenance as:

*"Routine maintenance of rigid IBCs means the routine performance on metal, rigid plastics or composite IBCs of operations such as:*

- (a) Cleaning;
- (b) Removal and reinstallation or replacement of body closures (including associated gaskets), or of service equipment, conforming to the original manufacturer's specifications, provided that the leak tightness of the IBC is verified;  
or
- (c) Restoration of structural equipment not directly performing a dangerous goods containment or discharge pressure retention function so as to conform to the design

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\* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14).

type (e.g. the straightening of legs or lifting attachments) provided that the containment function of the IBC is not affected;

*Routine maintenance of flexible IBCs* means the routine performance on plastics or textile flexible IBCs of operations, such as:

- (a) Cleaning; or
- (b) Replacement of non-integral components, such as non-integral liners and closure ties, with components conforming to the original manufacturer's specification;

provided that these operations do not adversely affect the containment function of the flexible IBC or alter the design type."

4. Paragraph 4.1.2.4 of the Model Regulations requires the following:

"Except for routine maintenance of metal, rigid plastics, composite and flexible IBCs performed by the owner of the IBC, whose State and name or authorized symbol is durably marked on the IBC, the party performing routine maintenance shall durably mark the IBC near the manufacturer's UN design type mark to show:

- (a) The State in which the routine maintenance was carried out; and
- (b) The name or authorized symbol of the party performing the routine maintenance"

5. This means that after routine maintenance performed by third party companies an additional mark in conformity with 4.1.2.4 shall be applied. However, experience has shown that in many cases when the routine maintenance has been carried out by a third party but on behalf of the owner the required marks are not applied. As it is believed that if routine maintenance is performed by third parties under the responsibility of the owner of the IBC whose State and name or authorized symbol is durably marked on the IBC, there is no additional value to know where and by whom the routine maintenance has been effectuated.

6. Therefore, it is proposed to amend paragraph 4.1.2.4 of the Model Regulations to clarify that if the routine maintenance performed by a third party on behalf of the owner of the IBC the marking requirements of 4.1.2.4 do not apply.

## Proposal

7. Amend 4.1.2.4 to read as follows: (new text underlined)

"Except for routine maintenance of metal, rigid plastics, composite and flexible IBCs performed by the owner or on behalf of the owner of the IBC, whose State and name or authorized symbol is durably marked on the IBC, the party performing routine maintenance shall durably mark the IBC near the manufacturer's UN design type mark to show:

- (a) The State in which the routine maintenance was carried out; and
- (b) The name or authorized symbol of the party performing the routine maintenance"

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