
Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 6 (b) of the provisional agenda

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

Maximum permitted stacking load of IBCs comments on ST/SG/AC.10/C.3/2018/27

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

1. The requirement to mark IBCs with a pictogram indicating the maximum permitted stacking load (6.5.2.2.2) in addition to be marked with the stacking test load in the UN string according to 6.5.2.1.1 (g) is considered to be beneficial to loading operations. However, the additional information displayed by the pictogram should not cause any misinterpretation in practice for which purpose it is provided.
2. The term “*in use*” in the current text of 6.5.2.2.2, “*The maximum permitted stacking load applicable when the IBC is in use shall be displayed ...*”, seems not to be precise enough to prevent from such misinterpretation.

Discussion

3. The proposal in informal document INF.22 (ICPP) (52nd session) to replace the term “in use” by the term “being transported”, discussed at the last meeting of the Sub-Committee, did not reach consensus because it was also considered to be not specific enough to address the intermediate temporary storage during transport operations, clearly distinguished from warehousing at the consignor’s or consignee’s premises.
4. The new proposal in document ST/SG/AC.10/C.3/2018/27 from ICPP, to renounce any indication under which conditions the information about the maximum permitted stacking load shall be applied, does not provide any guidance nor clarification of the issue.
5. Therefore, CEFIC proposes to apply the term “carriage”, already used in the Model Regulations, and to supplement a clear definition of the meaning of this term in section 1.2.1.
6. Based on the views shared by the delegations in the session of the Sub-Committee, the meaning of the term “carriage” could alternatively be provided by a supplementary Note to 6.5.2.2.2.

Proposals

7. Add the following definition in 1.2.1:

"Carriage means the change of place of dangerous goods, including intermediate stops made necessary by transport conditions. This definition also covers the intermediate temporary storage of dangerous goods in order to change the mode or means of transport (trans-shipment)."

Amend the first sentence of 6.5.2.2.2 to read as follows:

"The maximum permitted stacking load applicable ~~when~~ for the IBC is in use during carriage shall be displayed on a symbol as shown in Figure 6.5.1 or Figure 6.5.2."
