

**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**

**20 June 2018**

**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**

**Amendment of proposed text in  
ST/SG/AC.10/C.3/2018/49: Multiple marking of  
packagings, including intermediate bulk containers  
(IBCs) and large packagings, indicating conformity with  
more than one successfully tested design type (part II)**

**Transmitted by the European Chemical Industry Council  
(CEFIC)**

1. Document ST/SG/AC.10/C.3/2018/49 submitted by CEFIC and DGAC resumes the topic on multiple approved packages. It does not intend, nor provides any concerns to change any of the specific design criteria or performance test requirements of the different types of packagings, IBCs or large packagings.
2. When applying the concept of design type approvals consequently based on design criteria and performance test requirements, it is obvious that certain designs and constructions, e.g. boxes and IBCs, may simultaneously provide compliance to various design types of different kind and category of packagings, IBCs and large packagings as well.
3. It is only appropriate, therefore, to allow for multiple approvals to certify conformance to any successfully tested design type of the same or different kind and category, and it should also be permissible to apply the corresponding marks in entirety to the packagings, including IBCs and large packagings, individually or together in multiple combination.
4. In preparation of the fifty-third session of the Sub-Committee, discussions with experts of competent authorities and delegations of other industry organisations revealed potential for linguistic improvements of the proposed text in ST/SG/AC.10/C.3/2018/49.
5. The proposals provided in 2018/49 are reproduced in the following with improved language for the corrections of the interim text under 6.1.3.13, 6.5.2.1.3 and 6.6.3 adopted at the fifty-second session of the Sub-Committee (see ST/SG/AC.10/C.3/104/Add.1, annex II).

## Proposals

6. To prevent regulatory barriers, which contradict the concept of design type approvals based on design criteria and performance test requirements, amend the definition of IBCs in 1.2.1 to read as follows:

*“Intermediate Bulk Container (IBC)*

IBC means any rigid or flexible portable packaging, ~~other than those specified in Chapter 6.1,~~ that:

- (a) has a capacity of: ...
- (b) is designed for mechanical handling;
- (c) is resistant to the stresses produced in handling and transport, as determined by tests.”

7. To support awareness of the user about the permissibility of multiple approved design types supplement 4.1.1 by a new sub-paragraph under 4.1.1.3 to read as follows:

“4.1.1.3.1 Packagings, including IBCs and large packagings, may conform to one or more than one successfully tested design type of the same or different kind and category, and may bear more than one mark to display the relevant performance parameters in accordance with the requirements of 6.1.3.13, 6.5.2.1.3 or 6.6.3.4, as applicable.”

8. To fully implement the concept of design type approvals consequently based on design criteria and performance test requirements, remove the square brackets and amend the interim text adopted at the last session of the Sub-Committee under 6.1.3.13, 6.5.2.1.3 and 6.6.3 (see ST/SG/AC.10/C.3/104/Add.1, annex II) to read as follows:

“6.1.3.13 Where a packaging conforms to one or more than one tested packaging design type, including one or more than one tested IBC or large packaging design type, the packaging may bear more than one mark to indicate the relevant performance test requirements that have been met. Where more than one mark appears on a packaging, the marks must appear in close proximity to one another and each mark must appear in its entirety.”

“6.5.2.1.3 Where an IBC conforms to one or more than one tested IBC design type, including one or more than one tested packaging or large packaging design type, the IBC may bear more than one mark to indicate the relevant performance test requirements that have been met. Where more than one mark appears on an IBC, the marks must appear in close proximity to one another and each mark must appear in its entirety.”

“6.6.3.4 Where a large packaging conforms to one or more than one tested large packaging design type, including one or more than one tested packaging or IBC design type, the large packaging may bear more than one mark to indicate the relevant performance test requirements that have been met. Where more than one mark appears on a large packaging, the marks must appear in close proximity to one another and each mark must appear in its entirety.”