



Secretariat

Distr.
GENERAL

ST/SG/AC.10/2000/5
28 July 2000

ORIGINAL : ENGLISH

**COMMITTEE OF EXPERTS ON THE TRANSPORT
OF DANGEROUS GOODS**

(Twenty-first session,
4-13 December 2000,
agenda item 2 (b))

**WORK OF THE SUB-COMMITTEE OF EXPERTS
ON THE TRANSPORT OF DANGEROUS GOODS**

Draft amendments to the Recommendations on the Transport of Dangerous Goods

Packagings

**Remanufacturing, repair and routine maintenance
of intermediate bulk containers (IBCs)**

Transmitted by the expert from Belgium

Background

1. At the July session of the UN Sub-Committee, the ICPP submitted an information paper (UN/SCETDG/18/INF.66) concerning the remanufacturing, repair and routine maintenance of IBCs. The proposed text was adopted with some minor changes.
2. The expert from Belgium expressed reservations concerning several points of the adopted text, and announced that he would submit a paper for the December session of the Committee.
3. It was decided following an oral United Kingdom proposal to have all definitions concerning IBCs (remanufactured IBCs, repaired IBCs, routine maintenance of IBCs) grouped together under the reference "*Intermediate Bulk Containers (IBCs)*". This way forward however :

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- is different from the one used for packagings : in the list of definitions “*reconditioned packagings*”, “*remanufactured packagings*” and “*reused packagings*” are found in alphabetical order, according to the first word. The use of a different methodology for comparable cases can only create confusion and is not user-friendly;
 - for the large majority of the users, the key word they will want to check in the list of definitions is not “IBC”, but “remanufactured”, “repaired” or “routine maintenance”. They will not go to look at the “I” of IBC .
4. In the definition of “repaired IBCs”, the word “repair” does not always have the same meaning. In the text as it stands, the replacement of the rigid inner receptacle of a composite IBC is considered repair, and at the same time the inner receptacles of composite IBCs are not repairable. This leads to the logical conclusion that these inner receptacles can not be replaced.
 5. In the new 4.1.2.5, marking would be obligatory after every cleaning operation if it is not done by the owner (a very common case). This would multiply the markings on IBCs for no practical purpose. The really important markings would moreover become less apparent.
 6. In the new 6.5.1.6.5, the word “structure” is used which is not defined. It is very important to clarify that it does not include the receptacle nor the service equipment.
 7. In the new 6.5.1.6.6, it is the party performing the repair that has to mark the IBC, although the repaired IBC is subjected to the full testing and inspection requirements. Normally it is the party performing the tests and inspections that would be expected to do the marking.

Proposals

8. Classify the definitions of “*Remanufactured IBCs*”, “*Repaired IBCs*” and “*Routine maintenance of IBCs*” in 1.2.1 alphabetically according to the first word.

If this is not accepted, it is proposed to group all definitions concerning packagings (e.g. “*reconditioned packagings*”, “*remanufactured packagings*”, “*reused packagings*”) together under the reference word “*Packagings*”, and to introduce appropriate references in all applicable places (e.g. “*Remanufactured IBCs : see under Intermediate Bulk Containers (IBCs)*”).
9. The last sentence in the definition of “*Repaired IBCs*” is a prescription and should not be part of the definition. It should therefore be transferred to 6.5.1.6.5, as a second indent. To avoid confusion, it should read : “The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs that are impaired shall be replaced.”
10. Change the beginning of 4.1.2.5 to read :

“Except for :

- routine maintenance of metal, rigid plastics and composite IBCs performed by the owner of the IBC, whose State and name or authorized symbol are durably marked on the IBC;

- cleaning of metal, rigid plastics and composite IBCs, without any removals, reinstallations or restorations, and without any change of ownership;
the party performing routine maintenance shall ... “
11. In 6.5.1.6.5, replace “structure” with “structural equipment”.

12. In 6.5.1.6.6, replace (a) with the following text :

“(a) The party performing the tests and inspections after the repair shall durably mark the IBC near the manufacturer’s UN design type marking to show :

- (i) the State in which the tests and inspections were carried out;
- (ii) the name or authorized symbol of the party performing the tests and inspections;
and,
- (iii) the date (month, year) of the tests and inspections.”
