

UN/SCETDG/17/INF.9

Sub-Committee of Experts on
the Transport of Dangerous Goods
(Geneva, 6-17 December 1999,
agenda item 5 (e))

Packagings and IBCs

Comments on ST/SG/AC.10/C.3/1999/87 Reprocessing of Intermediate Bulk Containers (IBCs)

Transmitted by the International Confederation of Plastics Packagings Manufacturers (ICPP)

ICPP welcomes the proposal of ICCR which aims at more safety and a world-wide harmonization by defining the different kinds of IBC reprocessing in a field where no safety related regulations existed so far. ICPP expressly supports the explanations for the necessity of a regulation quoted in the justification of the ICCR application and would like to supplement them by means of a market overview, giving a description of the concrete market situation.

More than 4 million composite IBC with plastic inner receptacles are world-wide produced per annum, and more than two thirds of them are reused or reconditioned. From these reused or reconditioned IBC the majority is used again for the transport of dangerous goods. The present market situation is characterized by the fact that many reconditioned IBCs, which are repeatedly used for the transport of dangerous goods, are made of safety relevant parts from different manufacturers with the result that the original design type does not exist any more. Moreover it is not recognizable which reconditioner has executed this kind of reprocessing. ICPP and ICCR have been discussing this problem during the past two years and are convinced that it is necessary to close this gap in the UN-recommendations.

Nevertheless we suggest the following modifications of the present draft to prevent any misinterpretations for the interest of the planned harmonization.

1. Definition 'reconditioned IBC'

- *"reconditioned intermediate bulk containers include those metal, rigid plastic, and composite IBCs, the bodies, inner receptacles, and outer casings of which are:"*

Proposal:

Delete or define '*bodies*', add '*pallets*'.

Justification:

The term '*bodies*' has not yet been defined in the UN-regulations so far; '*pallets*' as a safety relevant part should be mentioned.

- (i) “*cleaned with all former contents, internal and external corrosions, durable marks, and labels removed;*”

Proposal:

Delete ‘*durable marks*’.

Justification:

If ‘*durable marks*’ are removed, the IBC cannot be sold for the transport of dangerous goods again. The IBC must remain recognizable as an IBC for the transport of dangerous goods.

- (ii) “*restored to original shape and contour, with service equipment cleaned and, as necessary, replaced and all non-integral gaskets replaced;*”

Proposal:

Modify as follows:

(ii) “*restored to original shape and contour, with **original** service equipment cleaned and, as necessary, replaced **with original manufacturer service equipment** and all non-integral gaskets replaced;*”

Justification:

Only the replacement with original parts from the IBC manufacturer guarantees that the approved design type will not be modified and the reconditioned IBC will meet all relevant requirements after its reprocessing. The combination of different components from different manufacturers would produce a new design type which has to be tested and approved.

- (iii) last half sentence

Proposal:

Delete in (iii) the last half sentence “*if the service equipment has been removed*”

Justification:

After the reconditioning the leakproofness test has to be executed in any case regardless if the service equipment has been removed or not.

2. Deletion of the term ‘*repaired IBC*’

In chapter 2 and 3 of the the document 1999/87 the paragraphs § 4.1.1.1 und 4.1.1.9 are revised with regard to the now defined terms ‘reused’, ‘reconditioned’ and ‘remanufactured’. The formerly used term ‘repaired’ does not appear any more.

Proposal:

The term ‘repaired’ has to be replaced in all chapters of the UN-recommendations by ‘reconditioned’ respectively

'remanufactured' IBCs, e.g. in 4.1.1.9, last sentence, or 4.1.1.12 (c).
