

# UN/SCETDG/18/INF/31

---

**COMMITTEE OF EXPERTS ON THE  
TRANSPORT OF DANGEROUS GOODS**  
**Sub-Committee of Experts on the**  
**Transport of Dangerous Goods**  
**(Eighteenth session,**  
**Geneva, 3-12 July 2000,**  
**agenda item 5 (d))**

## IBC PACKING INSTRUCTIONS

### Special Packing Provisions B3 and B4

Submitted by the experts from the United Kingdom and the United States of America

#### **Introduction**

Packing Instruction IBC08 only attracts Special Packing Provisions B3 and B4. *(Note: The 11<sup>th</sup> revised edition shows B3 assigned to IBC Packing Instruction IBC05 but this is an editorial error corrected by Corrigendum 2 (ST/SG/AC.10/1/Rev.11/CORR.2) dated April 2000.)*

They state:

“B3 Only flexible IBCs fitted with a coating or liner are authorized.”

“B4 For packing group I and packing group II substances, flexible, fibreboard or wooden IBCs shall be sift-proof and water resistant or shall be fitted with a sift-proof and water resistant liner.”

Whilst B3 was intended to be restricted to flexible IBCs and B4 was intended to be extended to include fibreboard and wooden IBCs as well, but only relating to PG I and II substances, the purpose of both provisions was to prevent the loss of product and the ingress of moisture. By using differing wording, some confusion has arisen concerning the intention of these provisions. It would be helpful if the wording of the Special Packing Provisions could be more closely aligned.

During the complex editorial exercise of assigning the appropriate Packing Instruction provisions, Special Packing Provisions B3 and B4 have been unnecessarily or incorrectly jointly assigned to certain substances. For example:

UN 1323 is a Packing Group II substance but unnecessarily attracts both B3 and B4, which apply the same requirement;

UN1418 is a Packing Group III substance which incorrectly attracts both B3 and B4, B4 being applicable only to PG I and II substances.

The experts from the USA and the UK are currently reviewing the assignment of these provisions to identify any other inconsistencies.

However, since substances of Division 4.3 are liable to become spontaneously flammable or give off flammable gases by interaction of water, it is suggested that such substances assigned to flexible, fibreboard or wooden IBCs should attract B4 irrespective of the Packing Group of the substance. In most instances this has already been done for Packing Group III substances despite B4 referring only to substances of Packing Group I and II. This would require the amendment of the wording to B4 to remove references to Packing Groups.

### **Proposal**

The experts from the UK and the USA therefore propose the following amendments to the Model Regulations:

#### **Proposal 1:**

Reword Special Packing Provision B3 as follows:

“B3 Only flexible IBCs which are sift-proof and water resistant or are fitted with a sift-proof and water resistant liner are authorised.”

Reword Special Packing Provision B4 as follows:

“B4 Flexible, fibreboard or wooden IBCs shall be sift-proof and water resistant or shall be fitted with a sift-proof and water resistant liner.”

#### **Proposal 2:**

Special Packing Provision B3 shall apply only to substances of Packing Group III assigned to IBC08.

#### **Proposal 3:**

Where Special Packing Provision B3 has been allocated to substances of Packing Group I or II assigned to IBC08 it should be replaced by Special Packing Provision B4.

#### **Proposal 4:**

Special Packing Provision B4 should be deleted from all Packing Group III substances assigned to IBC08 other than those of Division 4.3.

#### **Proposal 5:**

Delete Special Packing Provision B3 from all substances assigned to IBC08 where Special Packing Provision B4 is also applied.

The experts from the UK and the USA would be happy to undertake the editorial exercise necessary to implement proposals 2, 3, 4 and 5 if these are adopted.

---