



Secretariat

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**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 Globally Harmonized
System of Classification and Labelling of Chemicals**

**(First session, 9-11 July 2001,
agenda item 4)**

**REQUESTS FOR CONSULTATIVE STATUS
(NON-GOVERNMENTAL ORGANIZATIONS (NGOs))**

Request by the International Confederation of Container Reconditioners (ICCR)

Note by the secretariat

The secretariat has received from the ICCR the attached letter requesting consultative status with the Sub-Committee, which the Sub-Committee may wish to consider.

International Confederation of Container Reconditioners - ICCR
Responsible Container Management Worldwide

March 19, 2001

RIPA
The Reusable Industrial
Packaging Association
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Mr. Olivier Kervella, Head of Division
UN ECE Transport Division
Office 418
1211 Geneva 10
SWITZERLAND

Dear Mr. Kervella:

JDRA
Japan Drum
Reconditioners'
Association
Tekko-Kaikan 3-2-10
Kayaba-Cho,
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103-0025
Japan
Tel: 81-3-3668-1801
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I am writing on behalf of the International Confederation of Container Reconditioners (ICCR) to officially request consultative status with the new GHS Sub-Committee. As you are aware, ICCR has been an active participant in the work of the Committee of Experts on the Transport of Dangerous Goods for more than two decades. On its own and in conjunction with other organizations, ICCR has made a number of formal proposals to the COE on matters related to the manufacture, remanufacture, reconditioning, marking, and testing of steel and plastic drums, as well as intermediate bulk containers. Many of these proposals have been successfully incorporated into the Model Regulations.

SERRED
Syndicat Européen des
Récupérateurs et
Rénovateurs de Drums
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It is our belief that the GHS Sub-Committee will from time to time deal with issues affecting ICCR member companies. For example, we can foresee the GHS Sub-Committee examining definitions, marking and labeling, and materials classification matters. Changes to any one of these areas of regulation could significantly impact member company operations. For this reason, ICCR considers it necessary and prudent to obtain consultative status with the GHS Sub-Committee.

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To facilitate consideration of ICCR's request, I have attached a brief description of the association and its membership. Please let me know if you require additional information.

Sincerely,

Lawrence W. Bierlein, Secretariat
International Confederation of Container Reconditioners
(signed)

cc: Mr. Brian Chesworth, SERRED
Mr. W. Shocklee, RIPA
Mr. I. Hiramatsu, JDRA
Mr. D. Riddle, ACRA

International Confederation of Container Reconditioners

The International Confederation of Container Reconditioners was formed approximately 20 years ago and is comprised of the principle trade association's representing Europe, North America, Japan, and Australasia. ICCR provides a coordinated effort on international regulatory and standards-setting matters for the world's reconditioning industry. The group is active in the UN Sub-Committee and Committee of Experts on the Transport of Dangerous Goods, the International Maritime Organization, and various standards groups, including the Committee for European Standardization (CEN), and the International Organization for Standards (ISO).

The national and regional trade associations that comprise ICCR represent collectively over 230 container reconditioners that reprocess approximately 100 million steel and plastic drums, as well as intermediate bulk containers.

The organizations may be contacted as follows:

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