

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

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PACKAGINGS (INCLUDING IBCs AND LARGE PACKAGINGS)

Miscellaneous proposals

Marking of IBCs after inspection and repair

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

Introduction

ICPP supports basically the intention of the proposal from the expert from The Netherlands in ST/SG/AC.10/C.3/2004/39 to harmonize the requirements for IBC marking after inspection and repair.

However, the proposal does not consider the fact that the current text in the table in 6.5.2.2.1 is not clear concerning the date of the last leakproofness test either (6th line in the table). A survey among the manufacturers of composite IBC's and the members of ICPP showed that there are different marking procedures by the manufacturers of new IBC's. Under "additional marking" the date of the last leakproofness test is applied during production of the new IBC or no marking is done at all, just a reference to the production date and year according to the marking requirements in 6.5.2.1.1 (d), because this leakproofness test is identical with the month and year of production and part of the production itself.

ICPP is of the opinion that marking according to „primary marking" in 6.5.2.1.1 (d) is sufficient and an additional leakproofness test marking during the production of the new IBC is not necessary. The Dutch proposal for harmonization, in case of consequent use, would lead to a situation where not only repeated marking of date and year of the leakproofness test during production of a new IBC would become necessary but also the marking of name and State of the manufacturer, which have already to be applied on the IBC according to the primary marking in 6.5.2.1.1 (e) and (f).

Moreover ICPP suggests, for the sake of simplicity, not to take up the whole word „repair" in the marking but to use an abbreviation.

We propose therefore that the following wording should be considered as more suitable :

Proposal (amendments to proposal 2004/39 in bold)

1. Replace in the table of 6.5.2.2.1 "Date of last leakproofness test, if applicable (month and year)" and "Date of last inspection (month and year)" by:

- **the state in which the last inspection (b) is carried out;**
- **the name or authorized symbol of the party performing the last inspection (b);**
- **date of last inspection (b) and leakproofness test (month and year).**

Add superscript (b) at the end of 6.5.2.2.1 as follows:

"(b) Last inspection after the IBC was put into service (and subsequent leakproofness test, if applicable)."

2. Revise 6.5.1.6.6.2 as follows :

"The Party performing the tests and inspections after the repair shall durably mark the IBC with the following additional marking according to the table in 6.5.2.2.1:

- (a) the State in which the repair was carried out;
- (b) the name or authorized symbol of the party performing the repair, and
- (c) the date (Month and year) of the tests and inspections

In addition the Party performing the repair shall durably mark the IBC adjacent to the additional marking with the letters 'REP' to indicate the IBC has been repaired."
