

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
Transport of Dangerous Goods

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Item 4 (b) of the provisional agenda

PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)

Vibration test for IBC's

Comments to ST/SG/AC.10/C.3/2006/32 (France and the United States of America)

Transmitted by the International Confederation of Intermediate Bulk Container Associations (ICIBCA)

The joint France and United States of America document cites in the Background section:

1. "During the previous session of the Sub-Committee it was agreed that a proposal concerning vibration testing for IBC's could be considered under the following conditions (see ST/SG/AC/.10/C.3/56, para.38):
 - (a) Appropriate justification must be provided, bearing in mind that a broad consensus was necessary for introducing additional requirements that would significantly affect the packaging industry,..."

Several years ago the United States of America instituted an incident reporting system. The carrier of a dangerous goods lading is required to report any incident involving the failure of a packaging containing dangerous goods. During calendar year 2004 there were 36 reports related to composite IBC's containing a dangerous liquid. The reasons for failure in these 36 incidents are as follows:

15 incidents -	Defective or loose closures or valves
9 incidents -	Poor materials handling eg. Fork lift blade damage
4 incidents -	Manufacturing defects
3 incidents -	Failure in transit-no further explanation
1 incident -	inadequate blocking and bracing
2 incidents -	no apparent leakage of liquid
1 incident -	emergency truck stop
1 incident -	train derailment
36	Total

We submit that considering that there were in excess of 2 million IBC's shipped in the United States of America during 2004; the level of performance is extremely high and therefore there is not "adequate justification" to justify significant changes to the performance tests for IBC's in the UN Model Regulations. However the IBC manufacturers, who have been required to perform a vibration test by US Competent

Authority, agree that one of the reasons for the high level of performance is the ability to pass a vibration test. We therefore support the France and United States of America position that a vibration test should be made a requirement for IBC's in the UN Recommendations.

We, ICIBCA, are in basic agreement with the comments as submitted by ICPP in informal paper dated For the sake of uniformity however we suggest that:

The criteria for passing be the same as that which exists in:

- 6.5.4.4.4 Bottom lift test
- 6.5.4.5.5 Top lift test
- 6.5.4.6.5 Stacking test
- 6.5.4.8.5 Hydraulic pressure test

which reads: "No permanent deformation which renders the IBC, including the base pallet, if any, unsafe for transport and no loss of contents."
