

**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

Twenty-ninth session  
Geneva, 3-12 (a.m.) July 2006  
Item 4(b) of the provisional agenda

**PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)**

Bottom lift test for IBCs

Comments to ST/SG/AC.10/C.3/2006/20 (ICPP/ICCA)

Transmitted by the International Confederation of Container Reconditioners (ICCR)

1. The twenty-eighth session of the Sub-Committee accepted an amendment to 6.5.6.4.4 to say there should be "no observable permanent deformation of the IBC" as a result of the bottom lift test.
  2. The Sub-Committee also decided that all rigid IBCs should be considered reusable. This is consistent with the reality that in North America and Europe alone, more than 2 million composite IBCs are reprocessed annually. ICCR views tests and the criteria for passing the tests, therefore, with recognition that each IBC design type will make multiple trips.
  3. The bottom lift test is meant to be non-destructive. If the IBC is damaged significantly when tested it as it will be handled repeatedly in transport, then that design type should be considered to have failed the test. For each use, the IBC will be lifted to board the transport unit, to unload it from that unit, and to load it again after emptying. It is reasonable to assume that permanent deformation caused by lifting during design qualification testing only will become worse with repeated use of the IBC.
  4. ICCR believes there should be a limit on permanent deformation that is more specific than the phrasing proposed by ICPP/ICCA. Based on the Sub-Committee's decision that composite rigid IBCs are reusable packagings, we suggest that to pass this test: "Legs should remain intact, adequate to continue to support the unit in transport and stacking, with no piercing or significant creasing of the bottom plate that might reduce the integrity of the inner plastics receptacle, and no loss of contents."
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