

# UN/SCETDG/29/INF.57

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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  
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)**

**Comment to the proposals transmitted by the International Confederation of Plastics Packaging  
Manufacturers (ICPP) and the International Council of Chemical Associations (ICCA)  
in ST/SG/AC.10/C.3/2006/20**

**Transmitted by the expert from China**

1. The expert from China appreciates the representative from International Confederation of Plastics Packaging Manufacturers (ICPP) and the International Council of Chemical Associations (ICCA) submitting paper ST/SG/AC.10/C.3/2006/20 expressing the different opinions for a decision to amend 6.5.4.4.4 made by the 28<sup>th</sup> session of the Sub-Committee and offers the following comments on the proposals as presented in ST/SG/AC.10/C.3/2006/20 in order to facilitate further discussion by the Sub-Committee.
2. The expert from China recognises that bottom lifting of IBCs is a normal operation in transport and all IBCs on the market should be able to be safely and frequently lifted without deforming. However, it is not practical because of weight and cost implications that any packaging should be constructed in such a way that it will be strong enough so that there is no permanent deformation when it is subjected to misuse (in practice) or to an extreme test.
3. Because none of accident were attributable to LIFTING PROBLEMS so far, considering the economy and safety for IBCs, We believe that it is not necessary to amend the original wording concerning bottom lift test in the 14<sup>th</sup> revised edition of the UN Recommendation and support the viewpoints made by ICPP and ICCA, suggest to retain the previous requirement 6.5.6.4.4 included in the 14<sup>th</sup> revised edition:  
“No permanent deformation which renders the IBC, including the base pallet, if any, unsafe for transport and no loss of contents.”

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