

## 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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### PERFORMANCE OF PACKAGINGS, INCLUDING IBCs

#### Chapter 6.5

Transmitted by the Expert from France

#### **Application of the new criteria for the drop test on IBCs**

1. In the 15th edition of the UN recommendations, a new criteria for passing the drop test was introduced in Chapter 6.5 (refer to new 6.5.6.9.5 (d)) for IBCs.
2. Although this amendment may have a big impact on the approval of IBCs, no transitional period was introduced to indicate how to implement it to existing IBCs .

#### **Proposal n°1**

3. To solve this issue, it is proposed to proceed the same way as for the vibration test :
  - (a) Amend the second sentence of paragraph 4.1.1.3 to read as follows :

"However, IBCs manufactured before 1 January 2011 and conforming to a design type which has not passed the vibration test of 6.5.6.13 or which has not passed the drop test criteria of 6.5.6.9.5 (d) may still be used. "
  - (b) Add a Note after 6.5.6.9.5 (d) to read as follows:

"**Note** : The criteria in (d) applies to design types for IBCs manufactured as from 1 January 2011."
  - (c) Encourage experts to implement this transitional period in the next edition of all modal regulations which are going to enter into force in 2009 or in 2010.

**Paragraph 6.5.4.5.5**

4. Paragraph 6.5.4.5.5 indicates that "the competent authority may at any time require proof, by tests in accordance with this Chapter, that IBCs meet the requirements of the design type tests." Taking into account that the heading for 6.5.4.5 is "Repaired IBCs", it is now understood that this requirement only applies to repaired IBCs.
5. In the 13th edition of the UN Recommendations, this paragraph (old 6.5.1.6.7) applied to all IBCs. The expert of France thinks that this paragraph was introduced by mistake in the subsection related to repaired IBCs during the restructuration of Chapter 6.5.

**Proposal n°2**

6. The expert of France is of the opinion that paragraph 6.5.4.5.5 shall be renumbered to clearly indicate that it applies to all IBCs and proposes to move this paragraph as 6.5.4.4.4 to clarify the matter.
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