

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

“Re-Bottling/Cross Bottling” of Composite IBCs

Transmitted by the experts from Australia, Canada, and the United Kingdom

Background

1. It has recently come to the attention of the authors of this paper that an increasingly common practice is being adopted in industry in respect of “re-bottling” composite IBCs that appears not to be in accordance with the requirements of the Model Regulations.
2. Composite IBCs placed on the market that have been satisfactorily certified as meeting the required UN design type tests with both outer casings and rigid plastics inner receptacles produced by a single manufacturer, supplied to an initial customer, are increasingly being sold on to a new owner. The refurbishment often includes replacement of the rigid plastics inner receptacle and may include the replacement of other components as well. That new owner will, in many cases, not be in possession of the test report specified in 6.5.6.14.1 nor in possession of the closure requirements in 4.1.1.1. If the replacement receptacle conforms to the original manufacturer’s specification, its replacement is considered to produce a repaired IBC, as defined in 1.2.1. However, if the rigid plastics inner receptacle does not meet the original specification, the only way that the IBC can continue to be in compliance with the Model Regulations is if it receives a new design type approval and deemed to have been a re-manufactured IBC (as also defined in 1.2.1).
3. Unfortunately, there is increasing evidence that composite IBCs are being “re-bottled” with rigid plastics inner receptacles purchased from manufacturers other than the original supplier of the receptacle or the outer frame/casing. This results in a ‘new’ composite IBC with an original mark on the outer casing/frame and a rigid plastics receptacle marked in accordance with 6.5.2.2.4 whereby the manufacturer, the date of manufacture and the distinguishing sign of the State allocating the mark for the whole composite IBC is still shown.

The issue

4. It is the view of the authors that this action invalidates the original design type approval for the composite IBCs but subsequent purchasers or users of the IBC will be unaware that this is the case. Such IBCs have been tested by the authors of this paper and have been found to fail the required UN design type tests, thus identifying a potentially serious safety issue. There is also the question of calling into question the integrity of the original composite IBC manufacturer whose mark remains on the outer casing/frame.

Proposal

5. It is the intention of the authors to consider further the implications of this practice and to review the current Model Regulation requirements to identify what, if any, amendments to the text are necessary to ensure that 're-bottling' is clearly identified as being contrary to these requirements. In addition, the necessity of changes to the existing IBC marking requirements to provide better identification of the frame/inner receptacle combination that constitutes the tested and certified IBC design, will be reviewed.

6. In particular, the relevant trade associations are now invited to work with the authors of this paper to consider any necessary guidance to be provided to industry or the development of new text for the Model Regulations to be submitted to the Sub-Committee for consideration in July 2008.
