

**Committee of Experts on the transportation of**

Sub-Committee of Experts

Thirty-second session

**Performance of Packagings, Including IBC's**

Transmitted by ICIBCA (International Confederation of IBC Associations)

ICIBCA is a trade association that represents the manufacturers of new IBC's of all types. This includes all metal, all plastic and composite types.

With regard to **INF .33** submitted by Australia, Canada and the United Kingdom, we welcome the opportunity to work with the authors as suggested in paragraph #6 of their paper. Our members at IBC-North America have been engaged in an evaluation project with RIPA (Reusable Industrial Packaging Association), members of ICDR in order to supply information to the United States, Department of Transportation. We will be most willing to share this information with the authors of **INF .33** and others of the Committee of Experts that may be interested.

We suggest to the authors that a Work Group be formed to evaluate the various aspects of 'Re-bottling/Cross Bottling' of IBC's. If a Work Group is appropriate and approved by the Committee, We, ICIBCA, along with ICDR, would be pleased to host the work group and suggest that another Expert be appointed to moderate the work.