

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

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PERFORMANCE OF PACKAGINGS, INCLUDING IBCS

Comments on INF 31 “Cross bottling of IBCs”

Transmitted by the Expert from the United States of America

In UN/SCETDG/33/INF.31, the Expert from the United Kingdom proposes a number of amendments to the requirements of the Model Regulations relevant to composite intermediate bulk containers (IBCs). Although a number of the proposed amendments may be appropriate, the Expert from the United States is particularly concerned with the proposal to amend the definition in Chapter 1.2 for “Repaired IBC”. The amended text as proposed in INF.31 is as follows:

*“Repaired IBC” means a metal, rigid plastics or composite IBC that, as a result of impact or for any other cause (e.g. corrosion, embrittlement or other evidence of reduced strength as compared to the design type) is restored so as to conform to the design type and to be able to withstand the design type tests. For the purposes of these Regulations, the replacement of the rigid inner receptacle of a composite IBC with a receptacle conforming to the ~~original manufacturer’s specification~~ **original design type from the same manufacturer** is considered repair. However, routine maintenance of rigid IBCs is not considered repair. The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs are not repairable. Flexible IBCs are not repairable unless approved by the competent authority;”*

The wording “original design type” is viewed as appropriate and consistent with the intent of the Regulations, as any inner receptacle used as a replacement must certainly be expected to conform to the original design type. However, the wording “from the same manufacturer” is considered to be inappropriate. A manufacturer other than the original manufacturer capable of producing a replacement inner receptacle which conforms to the original design type should not be precluded from doing so. Such a requirement has no safety basis, and would unnecessarily limit the marketplace in a manner inconsistent with the purpose and nature of the Model Regulations.

The current provisions of the Model Regulations ensure that repaired IBCs, including those whose inner receptacles have been replaced, conform to the original design type. The requirements for repaired IBCs are specifically addressed in 6.5.4.

For example, 6.5.4.5.2 requires that a repaired IBC be subject to the full testing, inspection and documentation requirements of 6.5.4.4 as follows:

6.5.4.5.2 In addition to any other testing and inspection requirements in these Regulations, an IBC shall be subjected to the full testing and inspection requirements set out in 6.5.4.4, and the required reports shall be prepared, whenever it is repaired.

Relevant to such repaired IBCs, 6.5.4.5.5 states the following:

6.5.4.5.5 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.

As such, the proposal to limit the production of replacement inner receptacles to a particular manufacturer is unwarranted, and it is proposed that the definition for a repaired IBC instead be amended to read as follows:

“Repaired IBC” means a metal, rigid plastics or composite IBC that, as a result of impact or for any other cause (e.g. corrosion, embrittlement or other evidence of reduced strength as compared to the design type) is restored so as to conform to the design type and to be able to withstand the design type tests. For the purposes of these Regulations, the replacement of the rigid inner receptacle of a composite IBC with a receptacle conforming to the ~~original manufacturer’s specification~~ original design type from the same manufacturer is considered repair. However, routine maintenance of rigid IBCs is not considered repair. The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs are not repairable. Flexible IBCs are not repairable unless approved by the competent authority;”
