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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

Thirty-fifth session
Geneva, 22-26 June 2009
Item 5 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL
REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS**

Definition of Intermediate Bulk Containers (IBCs)

Transmitted by the International Dangerous Goods and Containers Association (IDGCA)¹

Introduction

1. Proposals of amendments to the Model Regulations concerning the maximum allowed capacity of Intermediate Bulk Containers (IBC) were considered during the 31st session in July 2007 (ST/SG/AC.10/C.3/2007/34 and informal document UN/SCETDG/31/INF.4) Since a clear position of experts was not stated during the session, IDGCA would like to specify its position and the statement of the question.

¹ In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118(c) and ST/SG/AC.10/36, para. 14)

2. Point i) of the definition of “Intermediate Bulk Containers (IBCs)” in section 1.2.1 determines that IBCs for dry solids and liquids of packing groups II and III should have a maximum capacity of 3.0 m³ (3000 litres).

3. International practice shows that a lot of dangerous cargoes, such as sulphur lump and granulate (class 4.1, UN number 1350), coal-pitch (class 9, UN number 3077), ammonium nitrate (class 5.1, UN number 1942), potassium chloride (class 5.1, UN number 1485) are transported in large amounts by different types of surface and water transport modes in one supply chain (“door-to-door”) with big numbers of reloading. The cargoes are transported in bulk and packed in IBCs of up to 3.0 m³ capacity.

4. However, in countries of the Commonwealth of Independent States (CIS), there is a long-term positive experience of transport of such cargoes in IBCs, the capacity of which exceeds 3.0 m³ (up to 15 m³). The use of such larger IBCs provides quite a number of advantages compared with that of IBCs with a maximum capacity of 3 m³, in particular with respect to the frequency of re-loading. The possibility of using such IBCs is confirmed by tests and certificates of a classification society and national competent bodies of the Russian Federation (see annexes to document ST/SG/AC.10/C.3/2007/34 as contained in informal document UN/SCETDG/31/INF.4).

Proposal

5. The proposal is to revise section 1.2.1 of the Model Regulations with the purpose of increasing the maximum allowed capacity of Intermediate Bulk Containers (IBCs) to more than 3 m³ (3000 litres) for dry solids of packing group III.

6. The Sub-Committee is invited to consider this proposal, or to provide the justification why the maximum capacity of such IBCs should remain limited to not more than 3 m³ (3000 litres).
