



**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****Forty-fourth session**

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Item 5 (g) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: packagings****Minimum wall thickness for Metal IBCs****Transmitted by the Stainless Steel Container Association (SSCA)¹****Introduction**

1. Chapter 6.5 of the United Nations Model Regulations on the Transport of Dangerous Goods describes the requirements for the construction and testing of Intermediate Bulk Containers (IBCs).
2. As defined in 6.5.1.3 there is a wide range of IBCs (categories) manufactured with different materials in accordance with table 6.5.1.4.1 (b).
3. The general principle for the manufacturing of IBCs is that they have – if applicable – to pass the different design type tests as described for example in 6.5.6.4. (Bottom Lift test), 6.5.6.5. (Top Lift test), 6.5.6.6 (Stacking test), 6.5.6.7 (Leakproofness test), 6.5.6.8 (Hydraulic Pressure test), 6.5.6.9 (Drop test), and 6.5.6.12 (Vibration test). The criterion for passing the tests is the “performance”.
4. Except for metal IBCs, there are no requirements defined which relate to the design and extend beyond the performance criterion. It can therefore be assumed that all IBCs which pass the design type tests are safe for the transport of dangerous goods.
5. Only for metal IBCs there is a “Minimum Wall Thickness” requirement in 6.5.5.1.6 (and in the table in 6.5.2.2.1).

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

6. SSCA thinks that this requirement is still a vestige / remnant from former times when metal IBCs were derived from tank containers (cubical tank containers). These regulations had made provisions regarding minimal wall thickness (former German “Technische Richtlinien für kubische Tankcontainer TRKTC 001”).
7. To treat all manufactures of IBCs in the same manner, SSCA proposes to delete the requirement “Minimum Wall Thickness” in 6.5.5.1.6 (and in the table in 6.5.2.2.1). The proposal is drafted below.
8. The deletion of the “minimum wall thickness” would lead to the effect that for manufacturers of metal IBCs the direct access to innovation and new developments is no longer blocked as it is today to a large extent.
9. The proposed revision would also help the manufacturers of metal IBCs to produce their metal IBCs in accordance with requirements coming from environmental legal regulations and customers’ demands.
10. Examples regarding the environmental aspect are the European Packaging and Packaging waste Directive (the packaging must meet certain “Essential Requirements”) as well as the new ISO Standard series ISO 18601 (especially ISO 18602 “Packaging and the environment – Optimization of the packaging system”).
11. The optimisation of the wall thickness could contribute to the environment protection by the realisation of a lower packaging weight.
12. SSCA would be very grateful if its request would be considered by the Sub-Committee and if it were given the opportunity to introduce its proposal.

Proposal

1. **Amend** the table in chapter 6.5.2.2.1 by deleting “and its minimum thickness in mm”. The text would read as follows:

6.5.2.2 Additional marking

- 6.5.2.2.1 Each IBC shall bear the markings required in 6.5.2.1 and, in addition, the following information which may appear on a corrosion-resistant plate permanently attached in a place readily accessible for inspection:

Additional marking	Category of IBC				
	Metal	Rigid Plastics	Composite	Fibreboard	Wooden
Capacity in litres ^a at 20°C	X	X	X		
Tare mass in kg ^a	X	X	X	X	X
Test (gauge) pressure, in kPa or bar ^a , if applicable		X	X		
Maximum filling/discharge pressure in kPa or bar ^a if applicable	X	X	X		
Body material and its minimum thickness in mm	X				
Date of last leakproofness test, if applicable (month and year)	X	X	X		
Date of last inspection (month and year)	X	X	X		
Serial number of the manufacturer	X				
Maximum permitted stacking load ^b	X	X	X	X	X

14. **Delete** 6.5.5.1.6.