

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

28 November 2013

Forty-fourth session

Geneva, 25 November – 4 December 2013

Item 5 (g) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: packagings**

Correction of 6.5.2.2.4 – Marking of the Date of Manufacture of the Plastics Inner Receptacle of Composite IBCs

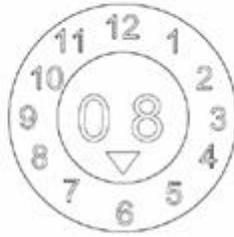
**Transmitted by the International Confederation of Plastics Packaging
Manufacturers (ICPP)**

Background

1. On the 42nd session of the Sub-Committee of Experts on the Transport of Dangerous Goods the proposal from ICPP UN/SCETG/42/INF.5 for a note in 6.1.3.1 (e) was discussed. This proposal only related to packagings of type 1H and 3H was adopted.
2. During the discussion an oral proposal was submitted in the Sub-Committee that 6.5.2.2.4 should be amended in the same way.
3. See excerpt from ST/SG/AC.10/C.3/84, page 12, point 5.:
 - “5. Marking of the date of manufacture of packagings of types 1H and 3H
Informal Document: INF.5 (ICPP)
49. The Sub-Committee adopted the proposal to specify in a new note in 6.1.3.1 (e) that methods of marking other than the one given in the example were authorized (...). Additionally, it was decided that 6.5.2.2.4 should be amended in the same way as 6.1.3.1 (e).”
4. The text of 6.5.2.2.4 in the 18th edition of the Model Regulations does not only contain the same note as in 6.1.3.1. (e) as intended by the Sub-Committee, an additional sentence from 6.1.3.1. (e) was taken over by error which does not make sense for composite IBCs, see

6.5.2.2.4 The inner receptacle of composite IBCs manufactured after 1 January 2011 shall bear the markings indicated in 6.5.2.1.1 (b), (c), (d) where this date is that of the manufacture of the plastics inner receptacle, (e) and (f). The UN packaging symbol shall not be applied. The marking shall be applied in the sequence shown in 6.5.2.1.1. It shall be durable, legible and placed in a location so as to be readily visible when the inner receptacle is placed in the outer casing.

The date of the manufacture of the plastics inner receptacle may alternatively be marked on the inner receptacle adjacent to the remainder of the marking. In such a case, the two digits of the year in the primary marking and in the inner circle of the clock shall be identical. An example of an appropriate marking method is:



NOTE: Other methods that provide the minimum required information in a durable, visible and legible form are also acceptable.

5. The modifications in the 18th amendment of the Model Regulations are underlined.
6. The sentence: “In such a case, the two digits of the year in the primary marking and in the inner circle of the clock shall be identical“, correct for packagings of the type 1H and 3H cannot be adopted for composite IBCs for the following reasons:
 - The marking of the inner receptacle does not contain a complete primary marking.
 - The date of manufacture of the IBC indicated in the primary marking on the plaque of the outer casing can differ from the production date of the inner receptacle. An example is the case of repair of composite IBCs when the impaired inner receptacle is replaced by a new one.

Proposal

7. Delete the sentence in 6.5.2.2.4: “In such a case, the two digits of the year in the primary marking and in the inner circle of the clock shall be identical“.