

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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Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-first session

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Item 6 (b) of the provisional agenda

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

Additional marking of the maximum stacking load of IBC

Transmitted by the expert from Germany

Introduction

1. The expert from Germany became aware of different interpretations of the requirement to mark the maximum permitted stacking load on IBCs.
2. The maximum permitted stacking load is mentioned in two places, in 6.5.2.2.1 and in 6.5.2.2.2. This aroused a discussion as to whether the sole indication of the maximum permitted stacking load on the pictogram (6.5.2.2.2) is sufficient, or whether there shall be marking for the second time as part of the additional marks in accordance with 6.5.2.2.1.
3. The issue of marking IBCs with the maximum stacking load was considered by the informal working group on IBCs held in Paris in October 2005 (see UN/SCETDG/28/INF.5) and during the subsequent Sub-Committee session in December 2005. The Sub-Committee agreed in principle that the marking with the stacking test load in the UN string in accordance with 6.5.2.1.1 (g) should remain unchanged, but that IBCs should additionally be marked with the maximum permitted stacking load. The current provisions were finally adopted at the twenty-ninth session of the Sub-Committee on the basis of document ST/SG/AC.10/C.3/2006/30
4. It becomes clear against the background of the discussions in 2005 and 2006 that the intention was to introduce the mark as a single mark that has to be displayed on the pictogram only.
5. However, the wording of the UN model regulations is not sufficient clear. The Model Regulations do not explicitly state that the specification is sufficient only within the symbol. The additional marks in accordance with 6.5.2.2.1 may be placed on a corrosion-resistant plate fixed in a readily accessible place. In 6.5.2.2.2 the information shall be displayed on a symbol but it does not refer to the former plate - suggesting that there are two signs, which logically have to be identical. Also the double transitional provisions in 6.5.2.2.1, footnote b and in the comment on 6.5.2.2.2 suggest that there are two parallel requirements.

Proposal

6. The Sub-Committee is requested to provide its view on the interpretation and consider whether an amendment of the UN Model Regulations is regarded as necessary. If one mark is considered to be sufficient, the footnote in 6.5.2.2.1 could be amended accordingly, for example as follows: “b The maximum permitted stacking load shall be indicated on the symbol, see 6.5.2.2.2. This additional mark shall apply to all IBCs manufactured, repaired or remanufactured as from 1 January 2011.”

7. Depending on the outcome of the discussion, the expert from Germany is willing to submit a formal proposal for the next session.
