

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

14 November 2018

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-fourth session

Item 2 (c) of the provisional agenda

**Recommendations made by the Sub-Committee on its fifty-first,
fifty-second and fifty-third sessions and pending issues:
listing, classification and packing**

**Composite Intermediate Bulk Containers (IBCs), inner
receptacle marking: Comments on
ST/SG/AC.10/C.3/2018/107**

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

Introduction

1. ICPP supports the intention of the expert from Belgium that the marking of the inner receptacle shall be visible also after assembling of the IBC.
2. The IBC manufacturing industry has highlighted during the discussion on the June meeting that for few specific design types of composite IBCs such a general rule cannot be applied. These IBCs e.g. of type 31HH1, 31HG1 or IBCs of type 31HA1 (see pictures) with full covering of the inner receptacle are designed for specific safety purposes without enabling “an accessible location” to the marking of the inner receptacle.
3. ICPP proposes for those specific IBCs an alternative solution of the identification requirement of the inner receptacle. It is proposed to double the marking of the inner receptacle on the outer casing. A similar procedure is also applied for the identification of items not visible by using overpacks according to 5.1.2.1.

Proposal

4. Add the following sentences to the proposal in document ST/SG/AC.10/C.3/2018/107 from the expert from Belgium as follows:

“For an IBC where the mark on the inner receptacle is not visible when installed in the outer casing, the required marking on the inner receptacle shall additionally be placed on the outer casing with the wording “Inner Receptacle; [UN mark]”. The duplicate marking shall be durable and legible.”



