

## 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 2018

### Fifty-fourth session

Geneva, 26 November-4 December 2018

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**

**Transmitted by the expert from Belgium and ICPP**

### **Introduction**

1. During the fifty-third session working paper 45 was presented to clarify the intent of the last sentence of the first paragraph of 6.5.2.2.4:
2. “The inner receptacle of composite IBCs shall be identified by the application of the marks 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 marks 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.”
3. Based on the comments received and after an informal discussion an alternative proposal is presented in paragraph 7 of this document.
4. The initially proposed text by Belgium in working paper ST/SG/AC.10/C.3/2018/107 is shown in paragraph 5 of this document. The initially proposed text by ICPP in informal document UN/SCETDG/54/INF.25 is shown in paragraph 6 of this document were done at the 54<sup>th</sup> session of the UN-SubCommittee:
5. The initially proposed text by Belgium in working paper ST/SG/AC.10/C.3/2018/107  
“6.5.2.2.4 Inner receptacles that are of composite IBC design type shall be identified by the application of the marks 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 marks shall be applied in the sequence shown in 6.5.2.1.1. It shall be durable, legible and placed in an accessible location so as to be readily visible at any time during and after assembling ~~when~~ the inner receptacle is ~~placed~~ in the outer casing.”.
6. The initially proposed text by ICPP in informal document UN/SCETDG/54/INF.25  
“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.”

## Proposal

7. Amend the first paragraph of 6.5.2.2.4 to read as follows: (new text underlined,  
~~deleted text stricken through)~~

“6.5.2.2.4 Inner receptacles that are of composite IBC design type shall be identified by the application of the marks 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 marks 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 accessible for inspection after assembling the inner receptacle in the outer casing, ~~visible when the inner receptacle is placed in the outer casing.~~ When the mark on the inner receptacle is not readily accessible for inspection due to the design of the outer casing, a duplicate of the required mark on the inner receptacle shall be placed on the outer casing preceded by the wording “Inner Receptacle”. This duplicate shall be durable, legible and placed in a location so as to be readily accessible for inspection.”.

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