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

17 October 2023

Sub-Committee of Experts on the Transport of Dangerous Goods

Sixty-third session

Geneva, 27 November – 6 December 2023

Item 11 of the provisional agenda

Unified interpretations of the Model Regulations

Approval of modified intermediate bulk containers

Submitted by the expert from the Netherlands

I. Introduction

1. In the Netherlands inspections have indicated that modified Intermediate Bulk Containers (IBCs) are in use. These modifications do not conform to the design type, on which the approval of the original IBCs is based. It was questioned if additional (design type) tests are required for these modified IBCs for approval and certification and if these modified IBCs should be subject to initial and periodic inspection and tests.

2. An example of a modification that was made to IBCs is that couplings have been fitted to the top of the IBC in the manhole cover to connect a pressure hose for a pump or generator. These connections were not on the drawings of the original design type and were fitted afterwards by the user.

3. The manufacturer of these IBCs indicated that they never install such couplings in the manhole cover of these IBCs. It appears that these IBCs were not reassessed after having been modified and that no (supplementary or initial) inspections were performed. In these specific cases no approval was given on the materials used or the welding programme and no hydraulic pressure test was carried out. It seems that the IBCs were subsequently tested several times periodically after the modification under 6.5.4.4 of the *Model Regulations*.

4. Our understanding is that these modified IBCs do not meet the definition of repaired IBC (6.5.4.5) nor the definition of routine maintenance of rigid IBC (1.2.1), but it does meet the definition of remanufactured IBC (1.2.1).

5. According to 1.2.1 remanufactured IBCs are subject to the same requirements of the *Model Regulations* that apply to new IBCs of the same type (see also design type definition in 6.5.6.1.1).

6. In our view a modified IBC is in fact a remanufactured IBC and should be subjected to a full test according to 6.5.6.3.5 that apply to new IBCs of the same type to get a new approval, certification and mark.

II. Conclusions of the Joint Meeting

7. Since 1.2.1 and 6.5.6.3.5 of the *Model Regulations* are harmonized with 1.2.1 and 6.5.6.3.7 of RID/ADR, this was discussed in the autumn 2023 session of the RID/ADR/ADN Joint Meeting (see the Joint Meeting's report ECE/TRANS/WP.15/AC.1/170, paragraph 53 and document ECE/TRANS/WP.15/AC.1/2023/31 of that session).

8. The Joint Meeting endorsed the interpretation by the Netherlands of modified intermediate bulk containers. The representative of the Netherlands offered to share the

outcome of the discussion with the Sub-Committee of Experts on the Transport of Dangerous Goods.

III. Request

9. The Sub-Committee of Experts on the Transport of Dangerous Goods is invited to confirm this interpretation and to act, as it deems appropriate.

IV. Justification

10. The aim of this document is to facilitate the clarification in the *Model Regulations* on the use of modified IBCs and to prevent unsafe situations during the transport of dangerous goods in such IBCs.

11. Ensuring a more systematic approach and a better rationale in the *Model Regulations* helps to develop clearer legal texts and avoid different criteria among different countries and inspection services, and thus helps to implement the United Nations Sustainable Development Goal number 16: Peace, justice and strong institutions.
