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**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****Fifty-fifth session**

Geneva, 1-5 July 2019

Item 6 (b) of the provisional agenda

**Miscellaneous proposals for amendments to the  
Model Regulations on the Transport of Dangerous Goods:  
packagings****Alternative service equipment, arrangements and methods of  
inspection and testing of IBCs****Transmitted by the expert from Germany\*****Introduction**

1. The provisions on the approval of packagings contain text on packagings with specifications different from those in the relevant chapters of part 6. A comparison of the different texts shows that the current wording referring to IBCs is not harmonized with the provisions for packagings and large packagings.
2. Paragraph 6.5.1.1.2 currently reads as follows:  
  
“Exceptionally, IBCs and their service equipment not conforming strictly to the requirements herein, but having acceptable alternatives, may be considered by the competent authority for approval. In addition, in order to take into account progress in science and technology, the use of alternative arrangements which offer at least equivalent safety in use in respect of compatibility with the properties of the substances carried and equivalent or superior resistance to impact, loading and fire, may be considered by the competent authority.”
3. The corresponding provisions for other types of containment are as follows:  
  
6.1.1.2 for packagings:

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\* In accordance with the programme of work of the Sub-Committee for 2019–2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).



“The requirements for packagings in 6.1.4 are based on packagings currently used. In order to take into account progress in science and technology, there is no objection to the use of packagings having specifications different from those in 6.1.4, provided that they are equally effective, acceptable to the competent authority and able successfully to withstand the tests described in 6.1.1.3 and 6.1.5. Methods of testing other than those described in these Regulations are acceptable, provided they are equivalent.”.

6.3.2.1 for packagings for division 6.2:

“The requirements for packagings in this section are based on packagings, as specified in 6.1.4, currently used. In order to take into account progress in science and technology, there is no objection to the use of packagings having specifications different from those in this Chapter provided that they are equally effective, acceptable to the competent authority and able successfully to withstand the tests described in 6.3.5. Methods of testing other than those described in these Regulations are acceptable provided they are equivalent.”.

6.6.1.3 for large packagings:

“The specific requirements for large packagings in 6.6.4 are based on large packagings currently used. In order to take into account progress in science and technology, there is no objection to the use of large packagings having specifications different from those in 6.6.4 provided they are equally effective, acceptable to the competent authority and able successfully to withstand the tests described in 6.6.5. Methods of testing other than those described in these Regulations are acceptable provided they are equivalent.” and

6.7.1.2 for portable tanks and multiple-element gas containers (MEGCs):

“In recognition of scientific and technological advances, the technical requirements of this Chapter may be varied by alternative arrangements. These alternative arrangements shall offer a level of safety not less than that given by the requirements of this Chapter with respect to the compatibility with substances carried and the ability of the portable tank or MEGC to withstand impact, loading and fire conditions. For international carriage, alternative arrangement portable tanks or MEGCs shall be approved by the applicable competent authorities.”.

4. It is apparent that the regulations in 6.5.1.1.2 for IBCs are based on the wording in 6.7.1.1 for tanks and differ remarkably from the regulations in 6.1.1.2, 6.3.2.1 and 6.6.1.3 for packagings. However, in most other aspects IBC regulations are following the regulations for packagings and large packagings.

5. The current regulations in 6.5.1.1.2 concerning “equivalent or superior resistance to ... fire” seem to be inappropriate for IBC types other than metal IBCs. Furthermore, a requirement that the IBCs with alternative specification shall be able to withstand the tests is missing.

6. In addition, there is currently no regulation on alternative methods of testing for IBCs while this is possible according to the regulations for packagings in 6.1.1.2 and 6.3.2.1 and large packagings in 6.6.1.3.

7. Contrary to packagings and large packagings, IBC are not only tested but also inspection is required as defined in 6.5.4.2 and 6.5.4.4. Hence, in addition to alternative methods of testing also alternative methods of inspection should be acceptable provided they are equivalent.

8. Therefore, it is proposed to redefine paragraph 6.5.1.1.2 to align the regulations for packagings, IBCs and large packagings.

## Proposal

9. Amend 6.5.1.1.2 to read as follows:

“The requirements for IBCs in 6.5.3 are based on IBCs currently used. In order to take into account progress in science and technology, there is no objection to the use of IBCs having specifications different from those in 6.5.3 and 6.5.5, provided that they are equally effective, acceptable to the competent authority and able successfully to fulfil the test requirements described in 6.5.4 and 6.5.6. Methods of inspection and testing other than those described in these Regulations are acceptable, provided they are equivalent.”

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