

Memorandum

To: Mr. Jeff Hart, Dangerous Goods Division, Department for Transport, United Kingdom

Date: 15 April 2008

From: International Industry Working Group on Rebottling and Cross-bottling IBCs

The following positions were developed in a meeting of ICCR, ICPP and ICIBCA on April 14 & 15 2008. A list of attendees is attached.

For purposes of clarity for this document only we used the following terminology:

- Rebottling is the action of replacing the inner receptacle with a new inner receptacle from the same manufacturer.
- Cross-bottling is the replacement of the inner receptacle of one manufacturer in the outer receptacle of a different manufacturer.

The following issues of the "First discussion document" were treated as follows:

1) What is meant by the term "original manufacturer's specification"?

We support the suggestion to change the terminology from "original manufacturer's specification" to "original design type", assuming the design type means a specifically-named manufacturer of a UN 31HZ1 IBC. Cage (outer receptacle) sized for a specific inner receptacle (bottle) capacity. Material is a specifically-named manufacturer of a plastics inner receptacle of a known thickness, and capacity to match the outer receptacle. Pallet element of wood, steel, plastics, or composite construction. Maximum filling and discharge opening dimensions.

2) How do you ensure compliance with the existing approvals if all the re-bottler has, is the mark on the frame of the IBC?

Both the bottle and cage are durably marked under current model regulations. The marks should correlate with one another. The marks should be readily visible.

3) How do you identify a legitimate cross bottled IBC when the mark on the outer frame is not linked to the new bottle?

The assumption in the Discussion Document is incorrect: the bottle and cage are marked and correlate with each other.

4) 4.1.1.1 requires packagings, which includes IBCs, to be closed in accordance with the information provided by the manufacturer. This duty is placed on the user/filler of the IBC but when he purchases a rebottled IBC what details does he request if the new bottle is not from the original manufacturer?

The remanufacturer has the same responsibility to provide closing instructions as an original manufacturer.

5) 4.1.1.9 requires the user/filler to satisfy himself that the IBC is capable of passing the tests in 6.5 before filling. A repaired IBC must have a test report – 6.5.4.5.2. Is this always the case? From whom does a filler obtain a test report for a re-bottled IBC?

There is not always a test report. The party who has performed the process of rebottling provides the test report.

Position on further text passages in the first discussion document.

Page 2, next to last paragraph:

The opinion that the original primary marking according to 6.5.2.1 on the outer casing must stay on the IBC in case of cross bottling is not supported. The former primary UN marking (6.5.2.2.4) should to be invalidated or removed. The original manufacturer of the IBC must permanently mark the cage or pallet in a readily visible area with an identifier specific to that original manufacturer.

Page 2, third paragraph:

The opinion is supported that remanufactured IBCs should be tested in the same manner as the tests for new IBCs. It is evident that 6.5.6.1 has to be uniformly applied for all IBCs. Approvals of selective testing should be the same for manufactured and remanufactured IBCs.

Page 3, Quality Assurance

- **Quality Assurance Programme for repair**

In principle we agree that all parties performing repair functions on IBCs should do so under a system of Quality Assurance that satisfies the Competent Authority.

- **Quality Assurance Programme for manufacture, remanufacture, routine maintenance, and testing**

Further, we agree that all parties performing the following functions: manufacture, remanufacture, routine maintenance, and testing are required to do so under a system of Quality Assurance that satisfies the Competent Authority.

Under current provisions of the Model Regulations we believe that a Quality Assurance programme for remanufacturing IBCs should be analogous to that for manufacturing new IBCs.

- **Reconditioned IBCs**

The term “Reconditioned” IBCs is called Routine Maintenance under 4.1.2.4.