

Rebottled vs. Reconditioned IBCs

Know which product-contact components are new, reused, cleaned, inspected, or replaced

THE QUICK CONCLUSION

A rebottled IBC has a new inner bottle installed in an inspected outer cage assembly. A reconditioned IBC retains a previously used bottle that has been cleaned, inspected, and returned to service. Neither label replaces product-specific qualification, but rebottling removes the prior-use and cleaning uncertainty associated with the inner bottle.

01 An IBC is a system

A composite IBC typically combines a rigid plastic inner bottle, closures and valve, an outer cage, and a pallet. The bottle, valve, gaskets, cap, vent, and other wetted parts form the product-contact system. The cage and pallet provide structural support. Qualification should address both systems without treating them as interchangeable.

02 What the two terms mean

Reconditioned IBC: The previously used inner bottle is cleaned, inspected, tested as applicable, and returned to service under the supplier's controlled process. Valves and closures may be reused, serviced, or replaced; the buyer should verify the actual specification.

Rebottled IBC: A new inner bottle is installed in a qualified, previously used outer cage and pallet assembly. The buyer should confirm whether the valve, gaskets, cap, vent, and every other wetted component are also new.

PRACTICAL DISTINCTION

Rebottling replaces the primary product-contact surface. Reconditioning relies on controlled prior-content acceptance, cleaning, inspection, testing, and release of a used product-contact surface.

03 Evidence to request

- For a reconditioned IBC: prior-content controls, unit traceability, cleaning-process validation, inspection and release records, and the disposition of valves and closures.
- For a rebottled IBC: bottle and wetted-component declarations, component identity and lot traceability, outer-assembly inspection, compatibility review, and completed-unit release records.
- For either construction: the exact product specification, intended use, receipt inspection requirements, change control, and nonconformance handling.

04 Why "food-grade" is not enough

"Food-grade" is a marketing shorthand, not a complete IBC specification. It does not identify prior contents, which components are new, the regulatory basis for each food-contact component, the food type, time and temperature conditions, cleaning status, or traceability. A buyer should evaluate materials, intended-use suitability, prior contents, traceability, cleaning controls, and construction separately.

05 Supplier qualification questions

- Which wetted components are new, reused, or serviced?
- What food-contact or other compliance documentation covers the actual supplied bottle, valve, gaskets, cap, vent, lubricants, inks, and additives?
- How are the unit, bottle, service components, processing lots, inspection, testing, and release records linked?
- If the bottle is reused, which prior contents are permitted and how is cleaning effectiveness validated?
- What inspection, leak testing, repair, release, and nonconformance controls apply?

06 Customer evaluation checklist

Use this checklist during supplier qualification, receipt review, or internal release. A checked box should reflect documented evidence.

- ☐ The purchase specification identifies rebottled or reconditioned construction.
- ☐ Every wetted component is identified as new, reused, serviced, or replaced.
- ☐ Prior-content requirements are defined for every reused product-contact surface.
- ☐ Cleaning and release evidence is available when a used bottle or wetted part is supplied.
- ☐ Component and completed-unit traceability requirements are defined.
- ☐ Compatibility and intended-use review has been completed.
- ☐ Receipt inspection and quarantine criteria are documented.
- ☐ Supplier substitutions and process changes require notification.

EVALUATION RESULT

If any required item cannot be checked, quarantine the unit or pause approval until the missing technical, documentation, or application question is resolved.

Primary references and document control

U.S. FDA, Determining the Regulatory Status of Components of a Food Contact Material — <https://www.fda.gov/food/packaging-food-contact-substances-fcs/determining-regulatory-status-components-food-contact-material>

U.S. FDA, Food Types and Conditions of Use for Food Contact Substances — <https://www.fda.gov/food/packaging-food-contact-substances-fcs/food-types-conditions-use-food-contact-substances>

49 CFR 180.352, Requirements for retest and inspection of IBCs — <https://www.ecfr.gov/current/title-49/section-180.352>

General educational information only. Customers remain responsible for packaging suitability, applicable requirements, and confirming current regulations and authorizations.

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