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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**  
(Twenty-second session, 2-6 December 2002  
agenda item 3)

**DRAFT AMENDMENTS ADOPTED BY THE SUB-COMMITTEE AT ITS  
TWINETEENTH, TWENTIETH AND TWENTY-FIRST SESSIONS**

**Model Regulations on the Transport of Dangerous Goods**

**Transport of Solid Substances in Bulk in Containers**

**New provisions in 6.8.4.6 and 5.4.1.5.8**

**Transmitted by the expert from Austria**

**1. INTRODUCTION**

At the 21st session of the Sub-Committee of Experts on the Transport of Dangerous Goods held during July 2002 new provisions on the transport of solid substances in bulk in containers were adopted (ST/SG/AC.10/C.3/42/Add.3).

In this context some delegates while being in general in favour of the new provisions for bulk containers other than CSC containers had some concerns regarding the requirement of a statement in the transport document (see 6.8.4.6 and 5.4.1.5.8) reading: "Bulk container BK(x) approved by the competent authority of .... "

Having re-considered the question, the expert from Austria shares these concerns. In his view, the introduction of such a requirement seems to be a considerable deviation from the principle governing similar cases, namely to express such sort of approval by an appropriate marking.

Marking avoids not only problems of language barriers but also problems of assignment of the responsibilities because in the case of marked packagings, including IBCs and large packagings, etc. it is assumed that those who apply the marking indicate that the packaging has been approved by or corresponds to a design type approved by the competent authority.

The consignor and others may then rely on this indication. In the case of a statement in the transport document each consignor, in order to avoid trouble in the case of failure, has to ascertain by himself that a valid approval by the competent authority exists for a certain bulk container. The expert from Austria doubts very much whether this can and would be done easily and properly.

## 2. PROPOSAL

1. Delete the new provisions in 5.4.1.5.8 concerning a statement in the transport document.
2. Replace the text of 6.8.4.6 by the following:

"6.8.4.6 Each bulk container manufactured and intended for use according to these Regulations shall bear markings which are durable, legible and placed in a location so as to be readily visible. Letters, numerals and symbols shall be at least 20 mm high and shall show:



- (a) The United Nations packaging symbol:

For metal bulk containers on which the marking is stamped or embossed, the capital letters 'UN' may be applied instead of the symbol;

- (b) The code designating the type of bulk container according to 6.8.2.3;
- (c) The month and year (last two digits) of manufacture;
- (d) The State authorizing the allocation of the mark; indicated by the distinguishing sign for motor vehicles in international traffic;
- (e) The name or symbol of the manufacturer and other identification of the bulk container as specified by the competent authority;
- (f) The maximum permissible gross mass in kg.

Marking shall be applied in the sequence shown in (a) to (f); each element of the marking required in these subparagraphs shall be clearly separated, e.g. by a slash or space and presented in a way that ensures that all of the parts of the mark may be easily identified.

Example of marking for a bulk container in accordance with (a) to (f) above:

UN BK1/12 02  
GB/HOPPER 4711/1200

For a sheeted bulk container; permissible gross mass:  
1200 kg

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