

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

Thirty-seventh session

Geneva, 21–30 June 2010

Item 5 of the provisional agenda

Miscellaneous proposals of amendments to the Model Regulations on the Transport of Dangerous Goods

Lunch time Working group on flexible bulk containers (BK3)

Transmitted by the expert from the United States of America

1. An informal working group met to discuss the proposals contained in 2010/39 and INF.8. Following the direction of the Sub-Committee, the group held a discussion on the principle of the proposal to introduce a new BK3 code for flexible bulk containers with the goal of determining if delegates could accept such a proposal if the text was improved to address specific concerns.
2. Some delegates expressed opposition to the proposal citing the following concerns:
 - There is no demonstrated need for such a container in multi-modal transport;
 - There would be problems in the intermodal transfer of the containers due to the special handling equipment required;
 - It would be impossible to ensure stability of this container in both land and sea transport;
 - The testing provisions are difficult or impossible to accomplish;
3. Other delegates felt the proposal held merit and should be considered for inclusion in the Model Regulations for the following reasons:
 - There was a need for an international standard for such packages since they were currently being transported in multiple countries;
 - The test provisions provided were adequate;
 - The materials proposed were permitted in BK2 containers and in bulk in accordance with the provisions of the IMO IMSBC Code;
 - Model operational requirements could be included to address concerns related to stability in transport.
4. The Sub-Committee is requested to consider if additional work should be carried out to improve the text in such a way that would allow flexible bulk containers to be considered for incorporation into the Model Regulations, and what additional transport provisions would be appropriate.