

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

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Listing, classification and packing

Assignment of BK codes – Revision of ST/SG/AC.10/C.3/2015/31

Transmitted by the expert from Germany

Introduction

1. The expert from Germany has compared the assignment of the BK codes in the IMDG Code with the assignment in the UN Model Regulations and has noted differences between the two. In the Dangerous Goods List of the IMDG Code, the code BK2 is assigned to several entries to which there is no BK code assigned in the Model Regulations.

Background

2. When the codes recommended by the United Nations Committee of Experts for the Transport of Dangerous Goods in bulk (BK1 and BK2) were incorporated, it was decided for the IMDG Code to exclusively allow closed bulk containers (BK2) for the transport of dangerous goods. The assignment was largely based on the assignment of the code for bulk packaging (BP). When a BP code had been assigned to an entry in the Dangerous Goods List of the IMDG Code, the code BK2 was incorporated.

3. To achieve harmonization between the modes of transport, the Government of Germany has proposed to delete the BK2 code in the IMDG Code for some of the entries concerned. These include the UN numbers 1402, 1446, 1469, 1485, 2211 and 3314 (see document CCC 2/6/4, reproduced in informal document INF.3).

4. Nevertheless, the expert from Germany is of the opinion that the possibility of transport in bulk containers by sea should be maintained for other entries in the IMDG Code, as the substances covered by these entries can, in any case, be transported in bulk in accordance with the provisions of the International Maritime Solid Bulk Cargoes Code (IMSBC Code). This is the case of UN numbers 1363, 1386, 1398, 1435, 2071, 2216, 2217 and 2793. With regard to these substances, consideration should instead be given to whether transport in bulk containers could also be permitted for other modes of transport. UN 1395, UN 1446 and UN 1469 are also allowed to be transported as solid bulk cargoes in accordance with the IMSBC Code, however, these substances should not be transported in bulk containers because of their subsidiary risk 6.1.

5. In this context, the provisions for bulk goods in 4.3.2.1 and 4.3.2.2 have to be taken into account. For substances of class 4.2 (UN Nos 1363, 1386, 2217 and 2793) and of class 4.3 (UN Nos. 1398 and 1435) only closed bulk containers should be allowed

Proposal

6. UN 2071 and 2216: Insert "BK 1" and "BK 2" in Column 10 of the dangerous goods list.

UN 1363, 1386, 1398, 1435, and 2793: Insert "BK 2" in Column 10 of the dangerous goods list.
