

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
(Twentieth session, 3-12 December 2001, agenda item 4)

TRANSPORT OF SOLID SUBSTANCES IN BULK CONTAINERS

New provisions

Comments to the proposal ST/SG/AC.10/C.3/2001/37

Transmitted by the expert from the International Council of Chemical Associations (ICCA)

1. INTRODUCTION

After the discussion of the new provisions during the last Sub-Committee session, Germany and the United Kingdom received comments from other experts. The revised proposal ST/SG/AC.10/C.3/2001/37 shows the further development in the intension to implement the transport of solid substances in bulk containers in the UN modal regulations. ICCA took active part in the discussion and supports the proposal from the experts of Germany and the United Kingdom but believes that further improvements are possible.

2. COMMENTS

6.8.3.5 Marking

ICCA is of the opinion that the additional marking for bulk containers proposed under para [6.8.3.5.2] will lead to major problems in daily transport business. Today bulk containers are ordered with short notice. The shipping/leasing companies take the requested containers – mostly 20` standard freight containers tested and approved by CSC – out of their stocks and deliver them directly to the customers. Most of these containers are used as one way bulk containers. Experience shows that it is more than uncertain that the proposed UN marking and the name of the responsible person will be deleted from the container after unloading. ICCA is afraid that many containers will be floating around the globe with names of persons who never have seen or inspected the container for the actual transport.

ICCA supports the requirement in 6.8.3.5.2 to have a person qualifying the bulk container but would prefer such a declaration in the container packing certificate instead of creating a totally new marking requirement for containers.

Annex 2

In the Annex all substances are listed which are nowadays permitted for bulk shipments under all modal provisions (IMDG Code and RID/ADR and 49CFR).

ICCA recognizes this list as a first idea and as the absolute minimum but regrets that the list of substances does not take into consideration the idea of the „rationalized approach“.

By studying the regulations of the different modes it can be determined that the modes already accept a lot more substances in bulk than those listed in Annex 2.

If the Sub-Committee of Experts accepts the principles of ST/SG/AC.10/C.3/2001/37 ICCA would be happy to present for the next Sub-Committee meeting a revised list of substances based on the idea „comparable goods shall be transported in equivalent enclosures“.

3. PROPOSAL

ICCA proposes the following changes/amendments to ST/SG/AC.10/C.3/2001/37:

4.3.2.1 Bulk goods of Division 4.2

⇒ Delete last sentence.

Reason: The last sentence in this paragraph contains an explanation and no regulation.

Regardless of the packing group the spontaneous ignition temperature must not be greater than 55 °C.

[6.8.3.5.2] Marking

⇒ Delete the proposed text. (see alternative text 5.4.2.1)

Reason: Practical problems in daily transport.

5.4.2.1 Container/vehicle packing certificate

⇒ Add new text in letter

(f) Container does qualify as bulk container type [BK__] according to chapter 6.8.

⇒ Renumber existing letters (f) → (i) to (g) → (j)
