

SUB-COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

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

TRANSPORT OF SOLID SUBSTANCES IN BULK CONTAINERS

Amendments to Chapters 1.2.1 and 6.8 Comments on ST/SG/AC.10/C.3/2001/37

Transmitted by the Expert from Norway

1. Introduction

While being generally in favour of the introduction new provisions into the Model Regulations for this kind of transport, Norway nevertheless will like to propose some changes to the proposed text.

1.1 This is first of all connected to the fact that in the offshore operations in the North sea, as well as in other parts of the world where offshore oil exploration is ongoing, a special kind of containers - designated as "Offshore containers"- are in use for bulk transport of dangerous goods. A definition of such portable tanks was adopted in 6.7.2.1 at the nineteenth session. The reference to such bulk containers should be introduced at the relevant places in the new text.

1.2 Norway also questions the need for limiting the lower capacity of bulk containers to 3.0 cubic meters. The lower limit of 450 litres was deleted for portable tanks at the nineteenth session, and there are offshore containers in existence with a capacity of less than 3.0 cubic meters. The ISO standard also sets the lower limit of containers at 1.0 cubic meter.

1.3 Furthermore, the Expert from Norway is of the opinion that the text in 6.8.3.4 is somewhat "over the top". In 6.8.3.4.1 it is stated that the "bulk containers" shall be tested and approved in accordance with the CSC Convention. The CSC Convention covers the construction, testing, approval and periodic inspection. Sub-chapter 6.8.3.4 may thus be simplified as proposed below.

1.4 In 6.8.4.4 the period of renewal is set to 2½ years. For offshore containers this period is set to 1 year. The text should reflect this.

1.5 We would also like to discuss the terminology used. The text refers to “bulk containers”, including road and rail vehicles. This is a terminology that may not be acceptable in all modes of transport. Chapter 4.3 in the IMDG Code now uses the term “Bulk packagings” for transport in bulk packagings, other than tanks. A better terminology may be “Bulk Cargo Transport Units”, even though this may cause some concern within the ADR environment.

2. Proposals (proposed new text is shown in bold)

2.1 In the proposed new text to be included in 1.2.1, under *Bulk containers*, fifth bullet point; change “3.0” to “**1.0**”.

2.2 In the proposed new text to be included in 1.2.1, in the third paragraph, starting with “Examples of bulk containers ...” insert after “freight containers, ..”: “**offshore bulk containers, ..**”.

2.3 In the proposed new text to be included in 1.2.1, under *Bulk containers*, add a new fifth paragraph:

“Offshore bulk container means: a bulk container specially designed for repeated use for transport of dangerous goods to, from and between offshore facilities. An offshore bulk container is designed and constructed in accordance with the Guidelines for the Approval of Containers Handled in Open Seas specified by the International Maritime Organization in document MSC/Circ.860.”

2.4 Change 6.8.3.4.2 to read: “**Freight containers used and qualified as bulk containers shall be inspected periodically according to the CSC Convention**”.

The rest of the text in 6.8.4.3 is to be deleted.

2.5 If the proposal in 2.4 above is not accepted, the following changes to the texts in 6.8.3.4.4 and 6.8.3.4.5 are proposed;

In 6.8.3.4.4, in the first line, change the text to read: “... an **Approved** Continuous Examination Programme (**ACEP**) in compliance with ...”.

In 6.8.3.4.5, in the second line, change the text to read: “.... it shall be repaired and **inspected** as set out in”.]

2.6 In 6.8.4.4, last sentence, add at the end: “... **unless other inspection periods are required in the various modes.**”

3. Consequential amendments

Depending on the outcome of any discussion held on the comment made in 1.5 above, the term “bulk container” may need to be changed into “**bulk transport unit**” throughout the whole text.