**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 16 November 2015

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**Global harmonization of transport of dangerous goods
regulations with the Model Regulations**

Definition of cargo transport units. Bulk containers and hazard communication

Note by the secretariat

1.   After a few years of hesitation, the RID/ADR/ADN Joint Meeting and the UNECE Working Party on the Transport of Dangerous Goods have finally agreed to include in RID, ADR and ADN the provisions of the UN Model Regulations concerning flexible bulk containers.

2.   Since this decision was taken, the secretariat has been asked whether flexible bulk containers had to be marked and placarded in accordance with Chapter 5.3. In fact the question of hazard communication in the case of bulk containers in general in the UN Model Regulations is unclear, since Chapter 5.3 applies to the marking and labelling of cargo transport units, and the definition of cargo transport unit does not seem to cover all types of bulk containers.

3.   The definition of "cargo transport unit" reads as follows:

> "Cargo transport unit means a road transport tank or freight vehicle, a railway transport unit, a railway transport tank or freight wagon, a multimodal freight container or portable tank, or a MEGC".

4.   The definition of bulk container includes a number of examples which are "freight containers, offshore bulk containers, ships, bulk bins, swap bodies, trough-shaped containers, roller containers, load compartments of vehicles, flexible bulk containers".

Not all these bulk containers are covered by the definition of cargo transport unit, and as a result it is unclear in the Model Regulations whether they have to be marked and placarded in accordance with Chapter 5.3.

5.   The Sub –Committee may wish to clarify the situation and develop text accordingly.