



**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****Forty-ninth session**

Geneva, 27 June – 6 July 2016

Item 6 (b) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: marking and labelling****Hazard communication Requirements for bulk containers****Transmitted by the expert from the United States of America¹****Introduction**

1. The secretariat reported in informal document INF.16 (48th session) that the recent implementation of provisions for the transportation of dangerous goods in Flexible Bulk Containers (FBC's) had led to questions as to whether bulk containers not meeting the definition of cargo transport units should be labelled as a package or be subject to the provisions of Chapter 5.3 on placarding and marking. The Sub-Committee discussed the issue at the 48th session, and as noted in the report, concluded that bulk containers that did not meet the definition of cargo transport units, including FBCs, are subject to the provisions of Chapter 5.3 and that a clarification was warranted.

Discussion

2. The view of the Sub-Committee that flexible bulk containers are subject to the placarding and marking provisions of Chapter 5.3 is further validated by existing requirements in 5.3.1.1.4 and 5.3.2.1.1 that require placarding of empty uncleaned bulk containers and marking in accordance with the requirements of 5.3.2 respectively.

¹ In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

3. Chapter 5.3 currently applies to the marking and labelling of cargo transport units. There are two definitions in Chapter 1.2 relevant to this discussion:

A cargo transport unit is “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”; and

A bulk container is “a containment system (including any liner or coating) intended for the transport of solid substances which are in direct contact with the containment system. Packagings, intermediate bulk containers, large packagings and portable tanks are not included. A bulk container is:

- Of a permanent character and accordingly strong enough to be suitable for repeated use;
- Specially designed to facilitate the transport of goods by one or more means of transport without intermediate reloading;
- Fitted with devices permitting its ready handling;
- Of a capacity of not less than 1.0 m³.

Examples of bulk containers are freight containers, offshore bulk containers, skips, bulk bins, swap bodies, trough-shaped containers, roller containers, load compartments of vehicles, flexible bulk containers;”

4. To ensure all means of containment meeting the definition of a “bulk container” are placarded in accordance with the requirements of Chapter 5.3, amendments to 5.3.1.1.2 and the title of Chapter 5.3 are proposed. The general marking requirements of Chapter 5.3 are applicable to solids in bulk containers under existing requirements in 5.3.2.1.1(b). To ensure all means of containment meeting the definition of a “bulk container” containing environmentally hazardous substances are marked appropriately additional editorial amendments to 5.3.2.3.1 and 5.3.2.3.2 are proposed.

Proposal

5. (a) Amend the title of Chapter 5.3 to read as follows:
- PLACARDING AND MARKING OF CARGO TRANSPORT UNITS AND BULK CONTAINERS
- (b) Amend the introductory paragraph of 5.3.1.1.2 to read as follows:
- “Placards shall be affixed to the exterior surface of cargo transport units and bulk containers to provide a warning that the contents of the unit are dangerous goods and present risks. Placards shall correspond to the primary risk of the goods contained in the cargo transport unit or bulk container except that:”
- (c) Amend paragraph 5.3.2.3.1 to read as follows:
- “A cargo transport unit or bulk container containing environmentally hazardous substances meeting the criteria of 2.9.3 (UN Nos. 3077 and 3082) shall be marked on at least two opposing sides of the unit or bulk container and in any case in such a position as may be seen by all those involved in the loading or unloading process, with the environmentally hazardous substance mark to be affixed in accordance with the provisions of 5.3.1.1.4 for placards.”

- (d) Amend paragraph 5.3.2.3.2 to read as follows:

“The environmentally hazardous substance mark for cargo transport units and bulk containers shall be as described in 5.2.1.6.3 and Figure 5.2.2, except that the minimum dimensions shall be 250 mm x 250 mm. For portable tanks with a capacity of not more than 3 000 lit and with an available surface area insufficient to affix the prescribed marks, the minimum dimensions may be reduced to 100 mm x 100 mm.”
