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Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Bern, 14–18 March 2016

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Carriage in bulk under BK or VC codes

Transmitted by the Government of Spain^{1, 2}

Summary

Executive summary: For carriage in bulk many UN entries have a VC code, but no BK code assigned. It should be possible to use BK bulk containers in that case also.

Action to be taken: The Joint Meeting is invited to include a note under 7.3.3.1.

Introduction

1. Carriage in bulk is permitted under the conditions specified in Chapter 7.3 of ADR, giving two different alternatives: the assignment of BK or VC codes.

¹ In accordance with the draft programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/WP.15/2015/19 (9.2)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2016/6.

2. BK bulk containers are fully intermodal containers, while VC vehicles and containers are not. When observing table A for RID/ADR, there are numerous UN Numbers where a VC code, but no BK code is assigned.

Analysis

3. BK and VC containments have to fulfill different requirements:

- for BK bulk containers, in 7.3.2.2 it is said that “The bulk container used shall conform to the requirements of Chapter 6.11.”, while

- for VC containments, in 7.3.3.1 in the second sentence of the introductory paragraph states that “Sheeted or closed vehicles or sheeted or closed containers used under this section need not be in conformity with the requirements of Chapter 6.11.”

4. BK bulk containers have to fulfill a specific set of conditions, while VC containments need not (for vehicles and containers). Nevertheless, it is unclear if a BK bulk container could be used each time a VC bulk container is allowed to be used.

5. Under 7.3.3.1 the codes VC1 and VC2 are defined as follows:

“VC1/2 Carriage in bulk in sheeted/closed vehicles, sheeted/closed containers or sheeted/closed bulk containers is permitted.”

6. But in the introductory paragraph of 7.3.3.1, reference is only made to sheeted/closed vehicles and sheeted/closed containers; these are the only ones for which the requirements in 6.11 do not apply. The third containment mentioned in the definition of the VC1 and VC 2 codes are the sheeted/closed bulk containers; and as nothing contrary is specified, to those the definition in 1.2.1 applies, and therefore they have to fulfill the requirements of 6.11. It can therefore be considered that these bulk containers are identical to the BK bulk containers; no differentiating requirements are set.

7. Therefore, it would be possible to use a BK container each time a VC code is assigned in column 17, provided that additionally the AP provisions for carriage in bulk would be fulfilled.

8. To clarify the abovementioned situation, and clearly allow the use of BK bulk containers when VC bulk containers are allowed, it is proposed to insert a Note under 7.3.3.1, as shown in paragraph 10.

9. This amendment would clarify the situation for all those UN Numbers for which a VC code is assigned in column (17), but no BK code is assigned to column (10).

Proposal

10. It is suggested to the Joint Meeting to insert a note under RID/ADR 7.3.3.1 as follows:

“NOTE: In case a VC1 or VC2 code is given in column (17) of Table A of Chapter 3.2, a BK1 or BK2 bulk container may be used for carriage, if additionally the conditions given in 7.3.3.2 are fulfilled.”

The rest of 7.3.3.1 remains unchanged.
