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**Special packing provisions B1 & B2 For IBCs**

**Transmitted by the European Chemical Industry Council (CEFIC) \*/**

<b>Analytical Summary:</b>	Adaptation of UN special packing provisions B1 and B2 related to IBC's to RID/ADR conditions.
<b>Action to be taken:</b>	Amend Special packing provisions B1 & B2 to include sheeted vehicles or containers.

**1. Introduction**

In the former RID/ADR, marginals XX204 indicated for specific substances the obligation to carry them on closed or sheeted vehicles or containers, in order to protect them from atmospheric effects (such as radiation heat, humidity). Those marginals were replaced by the special provision V1 "Packages shall be loaded on to closed or sheeted vehicles or into closed or sheeted containers" (item 7.2.4).

\*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT/III/2001/43.

Closed vehicles or containers as well as sheeted vehicles or containers are well defined in Part 1 of the new RID/ADR.

Concurrently new packing instruction, originated from the UN model regulations, have been introduced in the restructured RID/ADR. Item 7.2.3 specifies that “Certain packagings and IBCs may only be carried in closed vehicles or in closed containers”. It is applicable, in particular, to IBC04, IBC05, IBC06, IBC07 and IBC08 for solid substances, packing group I and II, where the special packing provisions B1 or B2 is effective.

As a result, a lot of solid substances of Classes 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 8 and 9, packing group I and II, when packed in IBCs cannot anymore be carried in sheeted vehicles or containers as it was allowed before.

Sheeted vehicles represent a significative share of the European vehicle fleet. This new requirement would result in that respect in a significant burden for industry which would not be justified by safety aspects.

## **2. Proposal**

Amend the special packing provisions B1 and B2 to include sheeted vehicles or sheeted containers as follows:

“ B1 For packing group I substances, IBCs shall be carried in closed or sheeted vehicles or containers.

B2 For packing group II solid substances, IBCs other than metal or rigid plastics IBCs shall be carried in closed or sheeted vehicles or containers.”

Amend in addition 7.2.3 to read: “Certain packagings and IBCs may only be carried in closed or sheeted vehicles or containers (see 4.1.2.3 and ...IBC08)”

## **3. Justification**

Special packing provisions B1 and B2 have been transferred as such from the UN recommendations i.e. from a model regulation applicable to all modes. The reference to sheeted vehicles or containers specific to rail/road transport (and in particular sheeting justify by protection against atmospheric effects) have not been considered at that level.

It is interesting to note, in this context, that there is no definition for closed vehicles or containers in the UN model regulations.

The substances concerned packed in IBCs have been transported up to now in sheeted vehicles without any problems in line with the best safety practices. The amendment proposed will allow to adapt the UN recommendations to the specificity of rail/road transport and to avoid the resulting unnecessary significant burden to industry.

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