HARMONIZATION WITH THE UN MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Special Provision W12/V12 of 7.2.4 of RID/ADR

Transmitted by the Government of the United Kingdom

SUMMARY

Executive summary: Following revisions to the IBC packing instructions IBC04 to IBC08 inclusive, there is a need to reallocate Special Provision W12/V12 of 7.2.4 of RID/ADR to various entries in Table A of Chapter 3.2 to harmonize with the UN Model Regulations.

Action to be taken: Retain W12/V12 in 7.2.4 with modified wording and allocate W12/V12 to all liquids in Table A of Chapter 3.2 that have been allocated packing instruction IBC03.


Introduction

1. UK Informal document INF.13 to the Joint Meeting in September 2007 was a comment on a paper submitted by the OTIF Secretariat (2007/6) which identified some inconsistency in the application of Special Provisions W10, W11 and W12/ V10, V11 and V12 in Column (16) of Table A of Chapter 3.2 of RID/ADR. In paragraph 3 of 2007/6 it was stated that the amendment
instructions in the 2003 notification texts was to add V12 whenever IBC06 or IBC07 was assigned. The result of this was to incorrectly add W12/V12 to many solids entries in RID/ADR.

2. The original intention of W10, W11 and W12/V10, V11 and V12 was to reflect special packing provisions B1 and B2 from the UN Model Regulations and to take account of any RID/ADR provisions that existed before 2001.

3. The decision to change B1 and B2 to special provisions for carriage is absolutely correct; the provisions have nothing to do with the packaging itself but with the way it is handled and stowed in a wagon/vehicle or container. The UN Sub Committee on the Transport of Dangerous Goods only placed the provisions in the IBC Packing instructions because there are few operational provisions in the UN Model Regulations.

Discussion and Justification

4. The problems surrounding W12/V12 can now be resolved because the UN IBC packing instructions have been corrected at UN. IBC packing instructions IBC04 to IBC08 are intended for solids; however they included IBC types designed for liquids (Code 31) notably 31HZ2. (See first three amendments to 4.1.4.2 in 2009/16/Add.1 where IBC types with Code 31 have been deleted from packing instructions IBC04 to IBC08 inclusive)

5. RID/ADR 4.1.2.3 and W12/V12 of 7.2.4 together equate to UN 4.1.2.3 which states “IBCs of type 31HZ2 shall be filled to at least 80% of the volume of the outer casing and always be carried in closed transport units.”

6. As the liquid IBC types have now been removed from these packing instructions IBC04 to IBC08, W12/V12 can be deleted from all the solids entries in RID/ADR. (This is reflected in 2009/16/Add.1 where in Column (16) of Table A of Chapter 3.2, W12/V12 is deleted wherever it appears)

7. Although paragraph 40 of 2009/16 and the amendment to 7.2.4 in 2009/16/Add.1 mention the deletion of W12/V12, there is in fact a need to add W12/V12 to all liquids in packing group III in Classes 3, 6.1, 8 and 9 to which IBC03 is allocated, as this is the packing instruction that authorizes IBC 31HZ2. The significance of the letter “Z” in IBC Codes is dealt with in 6.5.1.4, in particular footnote “a” to 6.5.1.4.3. In addition, unlike 31HZ1 also referenced in packing instruction IBC03, for 31HZ2 only certain types of outer packaging are permitted (31HA2, 31HB2, 31HN2, 31HD2 and 31HH2).

Proposals

8. Add“W12”/“V12” in Column (16) of Table A of Chapter 3.2 against all liquid entries of packing group III in Classes 3, 6.1, 8 and 9 which are allocated packing instruction IBC03.

As there appears to be some confusion about the meaning of “Z” in the IBC Code, consideration should be given to amending W12/V12 to read as follows:

W12/V12 “IBCs of types 31HZ2 (31HA2, 31HB2, 31HN2, 31HD2 and 31HH2) shall be carried in closed wagons/vehicles or containers.”

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