

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

##### Joint Meeting of the RID Committee of Experts and the

##### Working Party on the Transport of Dangerous Goods

Bern, 22–26 March 2010

Item 5 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: pending issues

### Comments on doc. ECE/TRANS/WP.15/AC.1/2010/25 (United Kingdom)

#### Carriage in bulk and in bulk containers

#### Transmitted by the Government of Portugal

#### Introduction

1. As explained in United Kingdom document “there are currently two parallel systems for dealing with carriage in bulk in RID/ADR” and the Government of the United Kingdom proposes that, in the future, there should only be one based on the multimodal system from the United Nations Model Regulations using bulk containers of codes BK1 and BK2.

#### Comments

2. In the annex to the referred document the United Kingdom has drafted some initial proposals on how to take this subject forward towards a single system. About this proposal we would like to present the following general comments:

(a) The idea of creating only one system for dealing with carriage in bulk in RID/ADR based on the multimodal system from the UN Model Regulations seems in principle to be a good idea. If it should be based using bulk containers codes BK1 and BK2 it is another question.

(b) To subsume all VV/VW codes to BK1 and BK2 seems to be problematic, since BK1 and BK2 concern to sheeted and closed *containers* and to ADR the term “container” does not cover vehicles. There are very particular questions (e.g. concerning vehicles) when considering VV/VW codes which are pertinent as special provisions for the carriage in bulk, and cannot simply to disappear.

(c) Bearing in mind the multiplicity of questions covered by codes VV1 – VV17 probably we should retain more than only codes VW/VV12 and VW/VV13.

(d) Among the particular aspects dealt in VW/VV codes which cannot simply disappear we point out the following: body metallic construction, ventilation, waste conditioning or loading, specially equipped vehicles, hermetic closures, surface coatings and linings, leak proof bodies, radioactive substances, etc.

#### Conclusion

3. Perhaps a good approach to this question would be in first hand to revise VW/VV codes to give more consistency to these provisions, and only afterwards, to consider the possible move to a more comprehensive system based on BK codes.