
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

Bern, 21–25 March 2011

Item 1 of the provisional agenda

Proposals for amendments to RID/ADR/ADN

Definition of the maximum permissible gross mass for FIBCs

Transmitted by the expert from France

Introduction

1. This document proposes to amend the definition of “maximum permissible gross mass” in 1.2.1 of RID/ADR/ADN in accordance with the definition in the Model regulations.
2. If the joint meeting has no time to discuss this paper and take a decision on it we would like it to be taken in account by the “definition working group” in April

Background

3. In December 2000, the UN Committee of Experts on the transport of dangerous goods has adopted amendments to the eleventh revision to the Model regulations (see ST/SG/AC.10/27/Add.1) and has decided in particular in Chapter 6.5 to :
 - (a) Delete the definition of “maximum permissible load”,
 - (b) Amend the definition of “maximum permissible gross mass” to avoid the term “load” to read : “Maximum permissible gross mass means the mass of the IBC and any service or structural equipment together with the maximum net mass”, and
 - (c) Delete the expression “maximum permissible load” each time this expression appears in Chapter 6.5 and in particular from the provisions related to the marking of FIBCs.

However, the expression “maximum design load” was kept in the description of the preparation of FIBCs for the top-lift test.

4. In June and September 2001, the Joint Meeting has adopted the corresponding amendments to the Restructured RID/ADR (see TRANS/WP.15/AC.1/84/Add.1 and TRANS/WP.15/AC.1/86/Add.3), which have entered into force since January 1st, 2003.

As a result, the definition of “maximum permissible gross mass” in 1.2.1 was amended in order to match the definition in the UN model regulations.

Nevertheless the current exclusion of flexible IBCs from the definition of “maximum permissible gross mass” was maintained, by contrast with the definition in the model regulations and in the IMDG Code, and the definition of “maximum permissible load” was also retained for flexible IBCs only in 1.2.1.

5. In December 2004, the UN Committee of Experts on the transport of dangerous goods decided to replace “maximum permissible load” with “maximum permissible gross mass” in the text describing the top-lift test for FIBCs (see ST/SG/AC.10/32/Add.1). This entered into force in RID/ADR 2007.

Current situation

6. As the definition of “maximum permissible gross mass” excludes FIBCs in 1.2.1 in RID/ADR only, confusion still exists on how FIBCs have to be marked even if it is quite clear that since 1st July 2003, the maximum permissible gross mass, as defined for other IBCs, shall be marked on FIBCs (see 6.5.2.1.1 (h) of RID/ADR).

Proposal

7. In order to clarify this situation, the expert from France proposes to :
- Delete the definition of “maximum permissible load” in 1.2.1 ;
 - Modify the definition of “maximum permissible gross mass” so that it also covers flexible IBCs, as following :

« *Maximum permissible gross mass:*

- (a) (for ~~all categories of IBCs other than flexible IBCs~~) means the mass of the IBC and any service or structural equipment together with the maximum net mass;
- (b) (for tanks) means the tare of the tank and the heaviest load authorized for carriage; ».

Noting in addition that a Working group on definitions will be held in Bucarest from 11-15 April 2011, it is proposed to refer the proposal to the WG in order to consider it in the context of the revision of 1.2.1.

Justification

8. Since the entry into force of RID/ADR 2007, the expression “maximum permissible load” has not been used anymore in the RID/ADR/ADN for IBCs and therefore is proposed to be deleted to avoid confusion. Furthermore there is a need to extend the definition of “maximum permissible gross mass” to flexible IBCs as this expression is used in the RID/ADR/ADN for all categories of IBCs.

9. This proposal aims at harmonising the RID/ADR/ADN with the UN Model regulations and at clarifying the actual procedure of tests carried out on flexible IBCs and their marking.