

OTIF



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LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

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### **RID/ADR/ADN**

Joint Meeting of the RID Committee of Experts and  
the Working Party on the Transport of Dangerous Goods  
(Berne, 21 - 25 March 2011)

### **Agenda item 6: Reports of informal working groups**

### **Comments from the International Union of Railways (UIC) on document ECE/TRANS/WP.15/AC.1/2011/16 (OTIF/RID/RC/2011/16) – Indicative text on the revision of the system of bulk codes in RID/ADR/ADN**

#### **Introduction**

1. In informal document INF.20 for the Joint Meeting in March 2010, UIC has already pointed out that if the current system of VW/VV provisions were to be replaced by a modified BK system, wagons/vehicles and their loading compartments respectively, used for carriage in bulk (which, according to the definition, also count as bulk containers), as well as containers without a CSC approval, would in future have to have a special approval in accordance with 6.11.4.4. In this context, UIC suggested that some text and comments be added to 6.11.4 and 6.11.4.4 to make clear that no special approval is necessary for wagons/vehicles that the competent authorities have approved in accordance with the provisions of transport law.
2. In the meantime, the United Kingdom and Romania have jointly submitted an indicative text on revising the codes for carriage in bulk. This text takes the UIC comments into account to some extent, but UIC is of the view that the text also contains some inconsistencies of form (document ECE/TRANS/WP.15/AC.1/2011/16 (OTIF/RID/RC/2011/16)).

For reasons of cost, only a limited number of copies of this document have been made. Delegates are asked to bring their own copies of documents to meetings. OTIF only has a small number of copies available.

3. UIC does not believe that the new system proposed by the United Kingdom and Romania contributes to simplifying the system or to making it more user-friendly and clear. In the present regulations, for land transport every UN number permitted for carriage in bulk is usually assigned only one VW/VV provision (in column 17 of Chapter 3.2, Table A), with all the conditions that have to be observed. Moving to the new system would mean that in future, for the UN numbers concerned, codes BK 1 and/or BK 2 (in column 17 of Chapter 3.2, Table A) and additional, class-specific provisions in 7.3.3 would have to be observed. For UN numbers 2794, 2795, 2800, 3028, 3257 and 3258 no BK code at all would be shown in column 17, but carriage in bulk would be permitted by means of separate special provisions in column 6 of Chapter 3.2, Table A.
4. UIC welcomes the working group's work on harmonising, improving and clarifying the present VW/VV provisions, but for the reasons set out in paragraph 3 above, suggests that the proposal from the United Kingdom and Romania should not be accepted. Instead, the present system should be maintained and the result from the working group should be used to revise the existing VW/VV provisions and, if necessary, 6.11.4.
5. However, if the Joint Meeting decides to accept the proposal from the United Kingdom and Romania, UIC asks the Joint Meeting, when dealing with the indicative text, to consider the additions and comments included in the following text that are underlined or in italics and underlined.

## Indicative text

### Chapter 3.2

**3.2.1** In the Explanatory notes for each column:

For column (10), final paragraph add: "in multi-modal transport" after "carriage of bulk goods".

For column (17) replace existing text with:

**"Column 17 "Special provisions for carriage in bulk containers"**

Contains alphanumeric codes starting with the letters "BK" referring to types of bulk containers described in Chapter 6.11 which may be used for the carriage of bulk goods in accordance with 7.3.1.1 (b), 7.3.2 and 7.3.3. If no code is given, carriage in bulk containers is not permitted.

**Note:** In addition, special provisions indicated in Column (18), concerning loading, unloading and handling, shall be observed. Special conditions in Chapter 3.3 may also permit carriage in bulk (UN 2794, 2795, 2800, 3028, 3257 and 3258.)"

## Table A

In **column (10)** delete all entries of "BK1" against assigned entries.

In **column (10)** against **UN 2912** and **UN 2913**, insert:

"see 4.1.9.2.3".

In **column (17)** delete all VV/VW Codes.

In **column (17)** insert "BK1" against those entries where "BK1" was previously shown in column (10).

In **column (17)** insert "BK1" and/or "BK2" against all entries where VV/VW codes were previously indicated (see Annex of ECE/TRANS/WP.15/AC.1/2010/25 – OTIF/RID/RC/2010/25) except where VV/VW 12, 13 or 14 were indicated.

For UN Nos. **2315, 3151, 3152** and **3432**, insert "BK1 BK2" in **column (17)**.

## Chapter 6.11 Requirements for the design, construction, inspection and testing of bulk containers

6.11.1 to

6.11.3 *[Unchanged]*

6.11.4 Delete the Note under the heading.

Amend 6.11.4.2 to 6.11.4.5 to read as follows:

"6.11.4.2 *Design and construction requirements*

6.11.4.2.1 These bulk containers shall be designed and constructed so as to be strong enough to withstand the shocks and loadings normally encountered during carriage including, as applicable, transshipment between modes of transport.  
*[Existing text of 6.11.4.2].*

6.11.4.2.2 Bulk containers shall be siftproof. Where it is necessary to use a liner in order to retain the dangerous goods it shall meet the provisions of 6.11.3.1.3.

6.11.4.2.3 The operational equipment of bulk containers designed to be emptied by tilting shall be capable of withstanding the total filling mass in the tilted orientation.

6.11.4.2.4 Any movable roof or side or end wall or roof section shall be fitted with locking devices with securing devices designed to show the locked state to an observer at ground level.

6.11.4.3 *Service equipment*

6.11.4.3.1 The service equipment shall meet the provisions of 6.11.3.2.1, 6.11.3.2.2 and 6.11.3.2.3.

6.11.4.3.2 The general design and construction requirements for bulk containers in this section are deemed to be met if they comply with the relevant provisions of [UIC leaflets 591 etc, EN Standard (swap bodies), EN Standard xxx (xxx)]<sup>1</sup> as appropriate **or if they are approved by a competent authority in accordance with the provisions of transport law (vehicles and wagons)** and do not therefore require notification to the competent authority according to 6.11.4.4.1 ~~or~~ **and** marking according to 6.11.4.5.

*(In these cases, which marking is affixed to the wagon/vehicle and what is there to tell the loader that the bulk container in question has been approved?)*

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<sup>1</sup> Subject to confirmation.

**6.11.4.4**      *Notification*

**6.11.4.4.1**      Manufacturers [owners-operators] of bulk container design types addressed in section 6.11.4 shall notify the competent authority in writing and certify that such bulk containers meet the relevant provisions for design and construction in this section and any relevant special provision in Chapter 7.3.

*(Contradicts 6.11.4.3.2, because in the cases referred to in 6.11.4.3.2, it is not necessary to notify the competent authority.)*

**6.11.4.5**      *Marking*

**6.11.4.5.1**      The competent authority shall assign a mark to the manufacturer comprising the following elements:

- Bulk container code (BK1 or BK2);
- The State authorising the allocation of the mark, indicated by the distinguishing sign for motor vehicles in international traffic;
- The name of the manufacturer or other identification of the bulk container specified by the competent authority;
- A unique bulk container number, given by the manufacturer.

An example of such a mark is:

"BK1/D/SCZ/1234" or  
"BK2/GB/XYZ/789".

*(Contradicts 6.11.4.3.2, because in the cases referred to in 6.11.4.3.2, it is not necessary for the competent authority to assign a mark.)*

**6.11.4.5.2**      Every bulk container shall be fitted with a durable, corrosion resistant metal plate not less than 200 x 100 mm with letters not less than [x] permanently attached to the bulk container in a place readily accessible for inspection showing the complete code."

*(Contradicts 6.11.4.3.2, because in the cases referred to in 6.11.4.3.2, a metal plate need not be fitted.)*

*Author's note:* The text in this section is an indicative layout, much of the content of which will depend on specific decisions made by the Joint Meeting.

**Chapter 7.3 Provisions for carriage in bulk containers**

**7.3.1.1**      Amend to read as follows:

**"7.3.1.1**      Goods may not be carried in bulk containers unless:

- (a) Either a special provision, identified by the code BK2, explicitly authorizing multimodal carriage is indicated in column (10) of Table A of Chapter 3.2 and the relevant conditions of 7.3.2 are satisfied in addition to those of this section; or
- (b) A special provision, identified by the code BK, explicitly authorizing this mode of carriage is indicated in column (17) of Table A of Chapter 3.2 and the relevant conditions of 7.3.2 and 7.3.3 are satisfied in addition to those of this section; or

(c) A special provision in Chapter 3.3 (6xy, 6za and 6bc in column (6) of Chapter 3.2, Table A for UN 2794, 2795, 2800, 3028, 3257 and 3258) and the provisions of this section are satisfied.

*[Last sentence and Note remain unchanged.]*

**7.3.2** Insert "or (b)" before "are applied" in the title.

**7.3.3** Amend to read as follows:

**"7.3.3 Additional provisions for carriage in bulk when the provisions of 7.3.1.1 (b) are applied**

The following additional provisions apply:

*[These provisions will later be given paragraph numbers in a similar manner to 7.3.2.]*

*Goods of Class 4.1*

UN No.1334 shall only be carried in bulk containers having metal surfaces in contact with the substance.

*Goods of Class 4.2*

[Goods of Class 4.2 shall only be carried in bulk containers having metal surfaces in contact with the substance.]

*Goods of Class 4.3*

Substances of PG II and III currently permitted in bulk are assigned to BK2.

Substances of PG II shall be carried in bulk containers which are hermetically closed.

[UN Nos.1405, 2844 and 3170 may be carried in BK1 if carried in pieces.]

[Substances of PG II and III may be carried in BK1 if carried in pieces.]

*Goods of Class 6.2*

*[Insert the text of special provision VV/VW11 if the Joint Meeting requires.]*

*Goods of Class 8*

Goods of Class 8 shall only be carried in bulk containers having adequate protection against corrosion.

*[For UN Nos. 2794, 2795, 2800 and 3028 transfer the contents of special provision VW/VV14 to a special provision 6xy in Chapter 3.3 and enter this in column (6) of Chapter 3.2, Table A against these UN entries.]*

*Goods of Class 9*

*[For UN Nos. 3257 and 3258: transfer the texts of special provisions VW/VV12 and VW/VV13 to special provisions 6za and 6bc in Chapter 3.3 and enter these in column (6) of Chapter 3.2, Table A for these two UN entries.]*

For UN Nos. 2315, 3151, 3152 and 3432:

Substances shall be carried in bulk containers which are leakproof or rendered leakproof, for example, by means of a suitable, sufficiently stout inner lining. These substances shall contain not more than on average 1 000mg/kg of substance to which this UN number is assigned. At no point in the solids shall the concentration of this substance or substances be higher than 10,000mg/kg.

UN Nos. 2211 (9), 3175 (4.1) and 3314 (9) Goods of UN xxxx shall be carried in bulk containers which are adequately ventilated.

UN 3175 (4.1), 3243 (6.1) and 3444 (8) Goods of UN xxxx shall be carried in bulk containers which are leakproof or rendered leakproof, for example, by means of a suitable, sufficiently stout inner lining.”

**5.4.1.1.17** Amend to read as follows:

**"5.4.1.1.17** (Deleted)".

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