Transmitted by the Government of Spain

Introduction

1. In 3.2.1 the explanation of the contents of the different columns in the table is given. For column (17) it is said:
   “... If no code or a reference to a specific paragraph is given, carriage in bulk is not permitted. ...”.

2. On the other hand, in 7.3.1.1 it is stated that:
   “Goods may not be carried in bulk in bulk containers, containers or wagons unless:
   (a) either a special provision, identified by the code “BK” or a reference to a specific paragraph, explicitly authorizing this mode of carriage 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 “VC” or a reference to a specific paragraph, explicitly authorizing this mode of carriage is indicated in column (17) of table

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1 In accordance with the programme of work of the Inland Transport Committee for 2014–2015 (ECE/TRANS/240, para. 100, ECE/TRANS/2014/23, cluster 9, para.9.2).
2 Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2015/25.
A of Chapter 3.2 and the relevant conditions of 7.3.3 are satisfied in addition to those of this section.

3. There appears to be a contradiction in between the two mentioned paragraphs. The text in 3.2.1 should be amended to take into consideration the two options included into 7.3.1.1.

4. The present situation creates uncertainty if carriage in bulk is allowed for the UN numbers UN, 2814, 2900 and 3373, where a BK code is inserted into column (10), but no code appears in column (17). For the UN numbers UN 1334, 1350, 1376, 1408, 1438, 1454, 1474, 1486, 1495, 1498, 1499, 1942, 2067, 2213, 2950, 2969, 3077, 3170, 3175, 3243, 3244, 3291, 3377, 3378, 3509, where both BK codes are introduced into column (10) and VC codes into column (17), it is unclear if the BK codes can be applied for bulk carriage.

Proposal

5. Amend the description of column (17) in 3.2.1 to read (new text in italics):

“… If no code or a reference to a specific paragraph is given, or a special provision identified by the code “BK” or a reference to a specific paragraph is indicated in column (10), carriage in bulk is not permitted. …”