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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**

Geneva, 19–29 September 2023

Item 5 (a) of the provisional agenda

Proposed amendments to RID/ADR/ADN:

Pending issues

**Clarification of the provisions applicable to the placarding of
removable skips used for the transport of dangerous goods in
bulk**

Transmitted by the Government of France,***

Summary

Executive summary:	The purpose of this document is to better define the rules applicable to the placarding of removable skips falling under codes VC1 and VC2 of 7.3.3 that are used for the transport of dangerous goods in bulk.
Action to be taken:	Amend chapter 5.3.
Related documents:	ECE/TRANS/WP.15/AC.1/168, para. 38. Informal document INF.17 of the Joint Meeting's 2023 spring session.

* A/77/6 (Sect. 20), table 20.6

** Circulated by the Intergovernmental Organization for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2023/44.



Introduction

1. At the March 2023 session of the Joint Meeting and in informal document INF.17 discussed at that session, the Joint Meeting invited France to propose in an official document the amendment that had received support in principle. France therefore proposes to amend RID/ADR/ADN Chapter 5.3 in order to clarify the placarding rules applicable to removable skips used for the carriage of dangerous goods in bulk.

2. The definition of bulk container given in 1.2.1 only concerns equipment used as BK1 or BK2 bulk containers, whether or not they conform to the Convention for SC. Particularly in the field of waste transport, removable skips that are not approved under BK1 or BK2 are very often used (provisions VC1 and VC2 of 7.3.3). Such equipment cannot benefit from the definition in 1.2.1, but nevertheless has the same characteristics as those described in the definition. In most cases, therefore, these skips are not placarded, as they are not considered by operators to be bulk containers, which poses safety problems, particularly when such skips are placed on land.



3. It is proposed to introduce a text in Chapter 5.3 to treat these removable skips as bulk containers and to apply the same rules to them in terms of placarding, in accordance with the provisions of Chapter 5.3.
4. France therefore proposes to amend Chapter 5.3 as follows (two options).

Proposal

Proposal 1

5. (RID:) After the heading of 5.3.1.2, insert the following note:
“NOTE: Removable skips are considered as bulk containers under this sub-section.”
(ADR:) At the end of the note to 5.3.1.2, add the following sentence:
“Removable skips are considered as bulk containers under this sub-section.”
6. At the end of 5.3.1.6, add the following note:
“NOTE: Removable skips are considered as bulk containers under this sub-section.”
7. (ADR only:) At the end of 5.3.2.1.4, add the following note:
“NOTE: Removable skips are considered as bulk containers under this sub-section.”

Proposal 2

8. Under the title of Chapter 5.3, add a new note, as follows:
“NOTE 3: Removable skips are considered as bulk containers under this Chapter.”

Justification

9. This amendment both clarifies the regulatory provisions and enhances the safety rules covering this type of transport equipment.
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