

**OTIF**



**ORGANISATION INTERGOUVERNEMENTALE POUR  
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN  
INTERNATIONALEN EISENBAHNVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-  
NATIONAL CARRIAGE BY RAIL**

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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, 22 - 26 March 2010)

**Agenda item 5 (a): Pending issues**

**Carriage in bulk and in bulk containers**

**Comments from the International Union of Railways (UIC) on document  
OTIF/RID/RC/2010/25 (ECE/TRANS/WP.15/AC.1/2010/25) and on the United Kingdom's  
informal document INF.3**

1. In document OTIF/RID/RC/2010/25 (ECE/TRANS/WP.15/AC.1/2010/25) (supplemented by informal document INF.3), the United Kingdom proposes the development of a single system of bulk container codes and submits a draft allocation of substances which can be carried in bulk in accordance with the existing provisions of RID/ADR to BK1 and BK codes (exception: the allocation of substances which, up to now, have been subject to special provisions VW 12/VV 12, VW 13/VV 13, VW 14/VV 14, VW 15/VV 15, VW 16/VV 16 and VW 17/VV 17 should in principle remain unchanged).

**Current VW/VV-System**

2. With the exception of a few UN numbers, to which BK1 and BK2 codes are exclusively allocated, all other substances allowed for carriage in bulk are also allocated VW/VV provisions. They may therefore be carried in wagons/vehicles/containers that do not require special approval in accordance with RID/ADR.

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## Consequences of introducing the system proposed by the United Kingdom

3. According to the United Kingdom's proposal, substances that have so far been allocated to special provisions VW 1/VV 1 to VW 11/VV 11 should in future be allocated BK1 and BK2 codes and should in part be assigned new special provisions in Chapter 3.3. In future therefore, these substances should only be carried in bulk containers. This would mean that wagons/vehicles currently used for transport, and their loading compartments respectively (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 RID/ADR 6.11.4.4. In addition, according to RID/ADR 6.11.4, during transport a special entry would be required in the transport document, which is not currently required when applying the existing VW/VV system.

### UIC suggestion

4. UIC nevertheless welcomes the transitional periods proposed by the United Kingdom for existing vehicles (wagons and vehicles) until the end of their useful life, but would suggest that for these, there should be no information in the transport document or special approval in accordance with RID/ADR 6.11.4.4, i.e. that the following amendments should be made to RID/ADR:

- a) Add the following to the end of the Note in 6.11.4:

"This shall not apply to wagons/vehicles in accordance with the Note to 6.11.4.4."

- b) Add a Note to 6.11.4.4:

**Note.** This shall not apply to wagons/vehicles approved by the competent authorities in accordance with the provisions of transport law."

### Justification

5. UIC is not aware of any problems that have arisen in practice with the current parallel system of carriage in bulk. In UIC's view, the United Kingdom's proposal to move to a single system for bulk container codes will neither improve safety to a recognisable degree, nor will it make any noteworthy progress towards harmonisation. What is more likely is that it would lead to more administration and additional costs both for those participating in the transport operation and for the approval and surveillance authorities.
6. The amendments proposed would enable the previously problem-free carriage in bulk in wagons/vehicles to continue without additional work (i.e. without special approval and without having to make an entry in the transport document).

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