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Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)

Twenty-fifth session

Geneva, 25–29 August 2014

Item 4 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:
Other proposals**

Flexible bulk containers (FBC)

Transmitted by the International Dangerous Goods and Containers Association (IDGCA)^{1,2}

Background

1. The UN Recommendations on the Transport of Dangerous Goods accept the use of flexible containers (BK3) for the bulk carriage of goods.
2. Chapters 4.3, 6.9, 7.3, 7.6 and 7.7 of the International Maritime Dangerous Goods (IMDG) Code accept the use of BK3 containers if they are arranged closely in not more than three tiers in cargo holds. However, the carriage of BK3 containers inside transportation units is not allowed.
3. At the spring session of the RID/ADR/ADN Joint Meeting it was decided to recommend that the ADN Safety Committee harmonize ADN requirements with the UN Recommendations concerning the use of BK3 containers (see

¹ In accordance with the programme of work of the Inland Transport Committee for 2012-2016 (ECE/TRANS/224, para 94, ECE/TRANS/2012/12, programme activity 02.7, (A1b)).

² Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2014/48.

ECE/TRANS/WP.15/AC.1/134/Add.2). In addition, BK3 containers have to comply fully with the requirements of chapter 6.11 of ADR.

4. In order to confirm that FBCs meet the requirements of 6.8.5 of the UN Recommendations, in March-April 2014 FBCs were tested in Saint-Petersburg at the Krylov State Research Centre, accredited by the German Accreditation Council (DAR), in the presence of experts from the Central Scientific Research Institute of the Marine Fleet (TsNIIMF), IDGCA, the Federal Scientific Research Institute BAM (Germany), and Lloyd's Register (Germany). BK3 containers were tested sequentially (top-lift test, topple-righting-tear and staking test). The test methodology and reports are submitted in Informal document INF.6.

Conclusions

5. The test results showed the possibility for heavy BK3 containers (up to 14 tonnes in weight) to be used in bulk multimodal transport (by road, railroad, inland and maritime transport). The addition of this kind of transport equipment to the ADN needs approval by the experts of the ADN Safety Committee. However, they might be approved under reservations similar to those made by experts of the International Maritime Organization when they approved the use of FBCs for the carriage of dangerous goods in marine transport (chapters 4.3, 6.9, 7.3, 7.6 and 7.7 of the IMDG Code).

6. The test reports for BK3 flexible bulk containers, signed by experts engaged in the test process and the attached photos, affirm the truth of the test results and settle any hesitations expressed by certain UN experts, concerning the existence of required equipment in the industry capable of testing BK3 containers in accordance with the UN Recommendations.

Proposal for consideration

7. We are requesting the experts of the ADN Safety Committee to agree to accept BK3 containers for bulk transport and/or to provide certain conditions for their carriage by inland waterways, and to add appropriate regulations to ADN.

8. However, it should be understood that the method of carriage using FBCs needs to be specified after this type of container is approved and the serial manufacture of the containers is certified by the competent authority of the Contracting Party and/or classification society.
