

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Geneva, 1-10 September 2003)

SECURITY OF TRANSPORT OF DANGEROUS GOODS

Transmitted by the Government of the Netherlands

1. Introduction

It was decided in the RID/ADR Joint Meeting from 24 to 28 March to introduce security provisions in the regulations for the transport of dangerous goods.

We have some comments on the basic text of Chapter 1.x (Security Provisions) as laid down in document TRANS/WP.15/AC.1/92/Add.2 (OCTI/RID/GT-III/2003-A/Add.2).

2. Remarks:

a) 1.x.1.3: Which participant will be addressed in case of violation of this rule?
Furthermore we still think that it is questionable whether this kind of provision should be part of the transport regulations. We are of the opinion that this provision is primarily related to a landside arrangement instead of a transport activity.

b) 1.x.3.2.2 (h): delete “the security of”, so that it reads “measures to ensure that the distribution of transport information is limited as far as possible”.
Which kind of restriction of distribution of transport information is meant here? In the Netherlands there is a tendency to inform emergency services and public in advance about possible risks with respect to dangerous goods.

c) The application of 1.x.3.4 should not prevent safety inspections or emergency response by the appropriate authorities.

It could be helpful to extend this paragraph with a sentence like: “If the doors of a vehicle/wagon or container are locked, the means of locking shall be such that, in cases of emergency or inspection by appropriate authorities, the doors can be opened without delay”. A comparable sentence is formulated in the IMDG Code, paragraph 7.5.2.4 (“If doors of cargo transport units are locked, the means of locking shall be such that, in cases of emergency, the doors can be opened without delay”)
