



**Economic and Social
Council**

Distr.
GENERAL

TRANS/WP.15/AC.1/2005/56
22 June 2005

ENGLISH
Original: FRENCH

ECONOMIC COMMISSION FOR EUROPE

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, 13-23 September 2005)

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

Chapter 1.4: Incorporation of new obligations for the loader and the consignee

Transmitted by the Government of Germany*

The secretariat has received from the Central Office for International Carriage by Rail (OCTI) the proposal reproduced below.

* Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2004/56.

SUMMARY

Executive summary: The investigation of a serious accident during the discharge of an intermediate bulk container (IBC) into a tank belonging to the consignee of the load, in which toxic and corrosive vapours formed because of incompatibility with the tank of the substances filled, has revealed that the cause was confusion on the part of the loader concerning the intermediate bulk container (IBC) to transport the dangerous goods. No check was made of the conformity of the basic classification particulars in the consignment note/transport document with the particulars on the intermediate bulk container (IBC), either during filling or on reception; a check would have made it possible to avoid confusion and prevent the accident.

Action to be taken: Introduction of a systematic obligation for the loader and the consignee as the main participant to perform this check.

Proposal

1.4.2.3.1 Add a new (a) to read:

“(a) check, on acceptance of the dangerous goods and before discharge from intermediate bulk containers (IBCs), large packagings, containers and tanks, whether the particulars in the consignment note/transport document of the UN number and the primary hazard and subsidiary risk class in accordance with 5.4.1.1.1 (c) correspond to the marking and labelling of the means of containment;”.

The existing (a) and (b) become (b) and (c).

1.4.3.1.1 Add a new (c) to read:

“(c) he shall, when handing over dangerous goods in intermediate bulk containers (IBCs), large packagings, containers and tanks, check whether the particulars in the consignment note/transport document of the UN number and the primary hazard and subsidiary risk class in accordance with 5.4.1.1.1 (c) correspond to the marking and labelling of the means of containment;”.

The existing (c), (d) and (e) become (d), (e) and (f).

1.4.3.1.2 Amend “1.4.3.1.1 (a), (d) and (e)” to “1.4.3.1.1 (a), (e) and (f)”.

Justification

Following an accident during the carriage of dangerous goods, the cause was investigated. It was observed that during the loading of the vehicle with various IBCs containing dangerous goods, prepared for carriage by the loader, an unsuitable IBC had been selected and filled although the particulars in the consignment note/transport document did not correspond to the intended transport operation. It contained sodium hypochlorite instead of hydrochloric acid.

No check was made during the filling of the intermediate bulk container (IBC) nor during the discharging of the dangerous substance, as to whether the particulars contained in the consignment note/transport document corresponded to the particulars on the intermediate bulk container (IBC) for the dangerous goods to be filled or discharged. When this substance was discharged into a tank filled with hydrochloric acid, a reaction occurred. Toxic and corrosive gases formed and a large number of workers received substantial injuries.

There is no specific requirement in RID/ADR of an obligation for the loader or the consignee to check conformity between the consignment note/transport document and the goods carried, before filling or discharging.

For this reason, it is proposed that a general obligation for the participants in question to make a check should be included in RID/ADR with regard to the basic verification that is always necessary to ensure that the documents are in accordance with the load.

This general check that conformity exists cannot in the circumstances concern all the characteristics contained in the transport document. This would be out of all proportion and would be too much to require of the various participants in the light of the obligations incumbent on them.

It would seem equally impractical to include all means of confinement (e.g. special packages) in this rule. Some degree of size or quantity of dangerous goods (jeopardy potential) is required for considerations of proportionality. This is why a limitation has been placed on the list of means of confinement.

The term “tank” includes all means of containment taken into account in the RID/ADR definition.

A check of whether the name and the marking in the consignment note/transport document conform to the means of containment for the transport operation also seems judicious from the standpoint of the security of carriage of dangerous goods.
