

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Bern, 19–23 March 2012

Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN

Physical and administrative inspections in terminals in accordance with 7.5.1

Transmitted by the International Federation of Freight Forwarders Associations (FIATA)

Related document: ECE/TRANS/WP.15/AC.1/2012/12 by the Government of Belgium

1. The Government of Belgium has raised the problem of the practical implementation of the provisions of RID/ADR 7.5.1.2 in container terminals.
2. FIATA has identified equal problems of interpretation with regard to road freight terminals where dangerous goods in packages are unloaded from and loaded on transport units. Like in container terminals practical planning and operational problems and financial consequences to road freight terminal operators occur when imposing administrative and physical inspections on each transport unit, given the large amount of packages with dangerous and non-dangerous goods and the quantity of transport units on a daily basis in logistics terminals.
3. In modern logistics operations, especially in regional distribution operations, for the purposes of loading an identical vehicle can appear at the respective terminal two or three times a day. The question is if, in cases like this, visual inspections shall be carried out each and every time the vehicle approaches. Therefore a representative sampled regime would be highly desirable indeed.
4. Moreover, the wording of 7.5.1.2 gives raise to uncertainty. It is unclear what the meaning of “visual inspection” is which leads to different interpretation of the scope of inspections. Furthermore it is unclear if there is an exclusive reference to such equipment used in loading only or to other equipment on board the vehicle like fire extinguishers and protection equipment as well.
5. As any kind of loading activities are addressed (packages, bulk, tank) the word “filling” should be added to the word “loading”.
6. Hence, FIATA also sees the need of clarification by means of amendments at least for the scope of the ADR.

Proposal

7. Amend 7.5.1.2 ADR as follows:

“The loading *or filling* shall not be carried out if:

(a) an examination of the documents ; or

(b) a visual inspection of the vehicle or of the large container(s), bulk-container(s), tank container(s) or portable tank(s) if any, as well as of their equipment used in loading, *filling* and unloading

shows that the vehicle, the driver , a large container, a bulk-container, a tank container or a portable tank or their *loading, filling and unloading* equipment do not comply with the regulatory provisions.”

Add : “*NOTE: ‘Visual inspection’ does not mean ‘technical inspection’.*”
