Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods Bern, 14–18 March 2016 Item 5 b) of the provisional agenda Proposals for amendments to RID/ADR/ADN: new proposals

29 February 2016

Comments on 2016/7 (EIGA: Amendment to 4.1.1.17 concerning pressure receptacles)

Transmitted by the Government of the United Kingdom

Introduction

1. Following consideration of paper 2016/7, the United Kingdom has considered the issue raised by the European Industrial Gases Association (EIGA) in general terms, in comparison to the similar text that is used within Chapter 4.2.

2. The United Kingdom agrees with EIGA on the issue of compatibility. However, the United Kingdom proposes using the text of 4.1.1.17 suitably amended as a Note under the Chapter heading. This would harmonize Chapter 4.1 with Chapter 4.2 in the approach taken.

Issue

3. The United Kingdom thinks that the text of 4.1.1.17 should appear as a Note directly under the heading of Chapter 4.1, so that there is consistency with the approach taken in Chapter 4.2 in relation to portable tanks and UN MEGCs.

4. 4.1.1.17 would then be deleted, with a consequential renumbering. This will act to further align the text of 4.1.1 with that of the United Nations Model Regulations.

5. The United Kingdom also considers the reference to 6.3.1, currently in 4.1.1.17 to be erroneous and should instead be to 6.3.4. In addition, we propose the addition of a reference to 6.2.2.9 and 6.2.2.10, to deal with the marking of UN metal hydride storage systems and UN bundles of cylinders.

6. By analogy, the United Kingdom also proposes that there should be an equivalent text for flexible bulk containers (BK3), by the addition of a Note under the heading of 7.3.2.10 for those that are marked in accordance with 6.11.5.5 but were approved in a State not contracted to RID/ADR.

Proposal 1

7. Add the current text of 4.1.1.17 as a Note under the heading of Chapter 4.1, amended as follows:

"*NOTE*: Packagings, including IBCs and large packagings, marked in accordance with 6.1.3, 6.2.2.7, 6.2.2.8, <u>6.2.2.9, 6.2.2.10</u>, 6.3.1<u>4</u>, 6.5.2 or 6.6.3 but which were approved in a State which is not an RID Contracting State / a Contracting Party to ADR may nevertheless be used for carriage under RID/ADR."

8. Consequential amendment:

i Delete the current text of 4.1.1.17 and renumber the paragraphs that follow accordingly.

Proposal 2

9. Under the heading of 7.3.2.10 of RID/ADR insert:

"*NOTE*: Flexible bulk containers marked in accordance with 6.11.5.5 but which were approved in a State which is not an RID Contracting State / a Contracting Party to ADR may nevertheless be used for carriage under RID/ADR."