



INF. 50

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RID/ADR/ADN

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
(Berne, 14 - 18 March 2016)

Agenda item 5 (b): Proposals for amendments to RID/ADR/AND – New proposals

Comments and position of UIP regarding document ECE/TRANS/WP.15/AC.1/2016/3 – OTIF/RID/RC/ 2016/3 (EASA)

Transmitted by the International Union of Wagon Keepers (UIP)

Background

1. In the English text of the EASA proposal it is stated:

"**1.8.3.1** Each undertaking, the activities of which include the consigning (including third parties), carriage, or the related operations packing, loading, filling or unloading, of dangerous goods by road/rail/inland waterways [RID: or operating a tank-wagon] shall appoint one or more safety advisers, hereinafter referred to as "advisers", for the carriage of dangerous goods, responsible for helping to prevent the risks inherent in such activities with regard to persons, property and the environment."

2. From the additional explanation of EASA given in the document it is recognizable, that with the wording in square brackets "[RID: or operating a tank wagon]" EASA wants to ensure that any party that operates a railway tank-wagon during the listed operations should have some responsible person for the role as "safety adviser".

3. According to RID 1.4.3.5 the "tank-wagon operator" is not requested to have a "safety adviser" in his organisation if you see tank-wagon operator also in the sense of the keeper of tank-wagon.

4. For that reasons the English text of document 2016/3 as well as its German translation could lead to misunderstandings.
5. To avoid these misunderstandings, UIP proposes to change the affected wording in the following way:

Amend the text in square brackets to read:

English: "[RID: or handling and operating a tank-wagon]".

German: "[RID: oder Befördern und Bedienen eines Kesselwagens]".
