

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

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Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN

Implementation of consignor's duties as per RID 5.4.1.2.2 d) (indication of holding time)

Query submitted by the International Union of Railways (UIC)

Introduction

With the entry into force of RID/ADR 2017, new provisions have been added to 5.4.1.2.2 d, according to which consignors must provide details in the consignment note of the date on which the actual holding time ends in respect of tank wagons and tank containers with refrigerated liquefied gases.

Furthermore, holding time has been defined in section 1.2.1 as follows:

The time that will elapse from the establishment of the initial filling condition until the pressure has risen due to heat influx to the lowest set pressure of the pressure limiting device(s).

In addition, in the report of the RID/ADR/ADN Joint Meeting's "Tanks" Working Group (Berne, 23 - 27 March 2015 – document ECE/TRANS/WP.15/AC.1/138/Add.1), in Item 11 Paragraph 26 concerning UIC INF document 17 on ascertainment of entry onto consignment note of holding times, the following was stated:

“The Working Group endorsed the proposal made by UIC. For empty, uncleaned tanks further work is needed to link the normal calculations to the prediction of the holding time due to the small amount of cryogenic liquid present in the tank. EIGA proposed to undertake this work for the RID/ADR 2017 editions, when the adopted text for cryogenic holding times will come into effect. Initial guidance for the operators is already provided for in EIGA Guidance documentation.”

By virtue of the above-mentioned definition and the observations contained in the tank working group's report, UIC had hitherto assumed that indication of holding times applied only to loaded tank wagons/tank containers.

However, UIC has been advised by the freight industry that indication of holding time is even more important for empty wagons than for loaded ones.

Irregularities relating to the safety valves during carriage of uncleaned tank wagons and tank containers by rail serve to confirm the problem in practice.

Query

In order to clarify the matter, UIC requests that the experts specify whether the provisions relating to holding time apply to loaded and empty uncleaned tank wagons/tank containers, or to loaded tank wagons and containers only.
