

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous GoodsJoint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bonn, 13-17 October 2003)Comments by the Government of Belgium to document TRANS/WP.15/AC.1/2003/43

1. Concerning the proposal to delete the table in 4.3.4.1.2

The arguments that are given in document TRANS/WP.15/AC.1/2003/43 to delete the table in 4.3.4.1.2 are only valid for the last column (hierarchy of tanks). Belgium agrees that the introduction of the general criteria for the hierarchy of tanks has made this last column superfluous. The other columns however explain the rationalized approach for assignment of ADR/RID tank codes to groups of substances, and these have to be retained.

2. Concerning the proposal to modify 4.3.4.1.3

Belgium supports the proposal to delete the sentence "*The hierarchy in 4.3.4.1.2 is not applicable*". But by doing this, the last sentence "*However, higher value tanks according to the provisions of 4.3.4.1.2 may be used with due regard to the special provisions indicated in Column (13) of Table A in Chapter 3.2*" is no longer necessary. (a note with a similar content might however be useful for the sake of user-friendliness).

3. The 1st of January 2003, the following precision has been added in 4.3.4.1.3 : "*...the alternate use of the tanks for other substances and groups of substances **is permitted only where this is specified in the certificate of type approval.***". Moreover, the sentence "*The requirements for these tanks are given by the following tank codes supplemented by the relevant special provisions indicated in column (13) of Table A in Chapter 3.2*" has been eliminated. These changes have made the paragraphs (a) to (h) of 4.3.4.1.3 completely meaningless and superfluous ; they therefore have to be eliminated.

4. Proposed texts for 4.3.4.1 :

4.3.4.1 Coding, rationalised approach, hierarchy of tanks and tanks for exclusive use

4.3.4.1.1 (unchanged).

4.3.4.1.2 *Rationalised approach for assignment of RID/ADR tank codes to groups of substances*

NOTE : *Certain substances and groups of substances are not included in the rationalised approach, see 4.3.4.1.4*

(the existing table of 4.3.4.1.2, without the last column)

4.3.4.1.3 *Hierarchy of tanks*

(the text as proposed in TRANS/WP.15/AC.1/2003/43 for 4.3.4.1.2)

4.3.4.1.4 *Tanks for exclusive use*

The substances and groups of substances, in respect of which a “(+)” is given after the tank code in Column (12) of Table A in Chapter 3.2, are subject to special provisions. In that case the alternate use of the tanks for other substances and groups of substances is permitted only where this is specified in the certificate of type approval.

NOTE : *The provisions of 4.3.4.1.3 also apply to these tanks for exclusive use.*

The present 4.3.4.1.4 is renumbered 4.3.4.1.5.
