

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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Item 5(a) of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Remarks on document ECE/TRANS/WP.15/2009/10:
Reference to material for the collecting container in 8.1.5.3

Transmitted by the Government of Switzerland

SUMMARY

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|---------------------|-------------------------------------------------------------|
| Executive Summary: | Allow the use of collecting containers suitable to the load |
| Action to be taken: | Change the wording in 8.1.5.3 |
| Related documents: | ECE/TRANS/WP.15/2009/10 |

Introduction

1. As proposed by EIGA, the adjustments (omission of the unnecessary equipment in the case of gas carriage - the shovel and the drain seal and the collecting container made of plastics - are to be welcomed. A genuine problem exists nevertheless in 8.1.5.3 (written instructions) and could be solved in our opinion together with the suggested changes in ADR Chapter 8.1.
2. By the "additional equipment for certain classes" we find:
 - Collecting container made of plastics ⁴⁾;
3. The size of the container is not defined. More important is that the quality (e.g. antistatic) of the plastic should be at least described. If containers from plastic are used which "statically" load themselves, which at present is quite legal, this can represent a genuine safety problem (e.g. in the case of the carriage of gasoline).

Proposal:

4. Instead of a definition of the plastic, it would be also conceivable to insert the following text:
 - Collecting container made of suitable material for the load ⁴⁾.

Justification

5. The practice has already shown that vehicle owners, with suitable containers, but not corresponding to the present wording of the ADR, made of aluminium with transport units for gasoline, get difficulties by controls. With the proposed wording, all the problems mentioned (size and suitability) would be solved.

Safety

The use of collecting containers suitable to the load would bring more safety.

Feasibility

No difficulties are foreseen.

Enforcement

It would facilitate the enforcement of the rule.
