

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 5 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: pending issues

Comments of Belgium to document ECE/TRANS/WP.15/AC.1/2010/40

Belgium has the following remarks, questions and proposals concerning document ECE/TRANS/WP.15/AC.1/2010/40 of Germany :

1. It is hard to imagine that the flammable liquids of UN 1969 ISOBUTANE and UN 1978 PROPANE (both UN-numbers reserved to the technically pure substance) are going to be used to power motor vehicles. They can be eliminated from the first paragraph of the proposed new xxx. On the other hand, if tanks containing UN 1966 HYDROGEN, REFRIGERATED LIQUID would present themselves, another approach than the one presented in xxx would be needed.
2. Paragraph (c) describes “*pressure resistant containments*” that have to be used if the receptacles are not leakproof or exhibit damage. It would be far better to impose the use of the recently introduced salvage receptacles for class 2.
3. Paragraph (d) is superfluous [it repeats part of paragraph (b)].
4. Paragraph (e) is not correct (a quantity does not exceed a pressure). A more correct wording would be :
 - (e) During carriage, the maximum allowable working pressure at 15 °C or the filling ratio as given in packing instruction P200 shall not be exceeded.
5. In (f), the words “*to the valve*” ought to be deleted ; damages to the tank itself are also to be prevented.
6. In (g), the words “*and that there is no mechanical damage to the surface of the gas tank*” are superfluous ; they repeat part of (b).
7. In (h), it is stated that gas tanks with external valves or pressurised external attachments always have to meet the provisions of 4.1.6.8 (b) or (c) [protection by caps, shrouds or guards], even if they are carried in pallet cages, protective frames, etc. This is in contradiction with 4.1.6.8, where frames or boxes are given as an alternative to the caps, shrouds or guards. Therefore, the words “*and meet the provisions of 4.1.6.8 (b) or (c)*” should be replaced with “or *meet the provisions of 4.1.6.8 (b) or (c)*”.
8. In (g) and (h), the following protecting material is being allowed :
 - in (g) : pallet cages, load carriers or pallets ;
 - in (h) : pallet cages, load carriers or protective frames.

In the second paragraph of (h), however, a drop test is imposed on protective boxes that have not been mentioned previously. Moreover, for reasons unclear to Belgium, the drop test is not imposed for the pallet cages and the load carriers.

9. It is also hard to imagine how this drop test can lead to a workable situation : the testing requirements of 6.1.5.3 are not fit for gases, and it is unclear how a carrier will know whether the type of tank he has to carry is the one with which the “*packing unit*” (!) has been tested (there are a nearly unlimited number of different types and sizes of custom-made gas tanks for vehicle propulsion in use). Moreover, as there is no drop test requirement for the transport of ADR/RID pressure receptacles, Belgium questions the need to have one in this case.

10. As a possible alternative, Belgium proposes the following new text for (f), (g) and (h) :

(f) Gas tanks with or without other pressurised external attachments shall be packed individually or together in pallet cages, on load carriers or in protective frames or boxes in such a way as to prevent damage ~~to the valve~~ and unintentional release of the gas under normal conditions of carriage. The gas tanks shall be secured so as to prevent slipping, rolling or vertical movement.

(g) Gas tanks with an internal valve and without other pressurised external attachments may also be carried unpackaged ~~in pallet cages, on load carriers or~~ on pallets. ~~If transport pallets are used,~~ It shall be ensured that the dimensions of the pallet exceed those of the gas tanks at each point by at least 5 cm ~~and that there is no mechanical damage to the surface of the gas tank. The gas tanks shall be secured in the pallet cage, on the load carrier or on the transport pallet so as to prevent slipping, rolling or vertical movement.~~

(h) (Deleted).

11. In (i), “*in protective boxes*” ought to be added to the list of possibilities.

12. In (j), the words “*in accordance with RID/ADR/AND 5.4.1*” are to be deleted (they contradict the rest of the paragraph, which is NOT in agreement with 5.4.1 !).

13. Before it is possible to state in (k) that “*the other provisions of RID/ADR/ADN shall be observed*”, it must be clear what provisions need not be applied. As the proposal stands now, there is no derogation from any provision of RID/ADR/ADN, and xxx comes as a supplement to them.
