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Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Gas cylinders in ships and aircrafts

Transmitted by the Government of Sweden^{1,2}

Summary

Executive summary:	The aim of this proposal is to permit transport by road and rail of cylinders that are part of the equipment in ships and aircrafts.
Action to be taken:	Introduce a new special provision in Chapter 3.3.
Related documents:	Informal document INF.20 of the 82nd session of the Working Party on the Transport of Dangerous Goods in May 2007 and ECE/TRANS/WP.15/192, paras. 30-32 (Report of the Working Party on its eighty-second session).

¹ Conformément au programme de travail du Comité des transports intérieurs pour la période 2010-2014 (ECE/TRANS/208, par. 106, et ECE/TRANS/2010/8, activité 02.7 c)).

² Diffusée par l'Organisation intergouvernementale pour les transports internationaux ferroviaires sous la cote OTIF/RID/RC/2013/22.

Introduction

1. Equipment in ships and aircrafts sometimes must undergo service actions. In some cases, this equipment includes gas cylinders which need to be filled or be periodically inspected.
2. The problem arises when the cylinders are demounted from their application in the equipment in order to be transported by road or rail for filling or inspection. These transports are, after all, transports of dangerous goods and Sweden cannot see that they can be carried out in accordance with the current legislation.
3. Both ships and aircrafts have in certain equipment often cylinders that are approved by the US Department of Transportation (D.O.T.-approved).
4. At the 82nd session of WP.15 in May 2007, the government of the United Kingdom submitted an informal document, INF.20, where this problem was described. Several member states commented that the proposal was in contradiction with the general principle of harmonization.
5. Now, almost six years have passed, and UN-cylinders are still not used to such an extent that the problem can be solved. Sweden is of the opinion that the problem to carry D.O.T.-approved cylinders used in some equipment remains, and we believe that other countries face the same problem.
6. Typically, these gas cylinders in ships and aircrafts are approved by the US Department of Transportation and can be transported by road under the Multilateral Agreement M237 from a location of temporary storage to the end-user. However, that multilateral agreement is used when gas is imported in D.O.T.-approved cylinders, and therefore M237 does not cover transport for filling and inspection of cylinder used in equipment.
7. To solve the problem, Sweden proposes a new special provision in RID/ADR/ADN that allows transport of D.O.T.-approved gas cylinders containing gases with classification code 1A or 1O to be transported by road and rail for filling and/or inspection.

Proposals

8. Introduce a new special provision in Chapter 3.3, which would be applicable to all gases with a classification code of 1A or 1O and would read as follows:

“6XX Cylinders approved by the US Department of Transportation, D.O.T. and solely for use within the equipment of a ship or aircraft, but not conforming to the provisions of 6.2.3, may be carried for the purpose of filling or inspection provided the following conditions are met:

 - (a) The cylinders shall be carried with a valve protection in conformity with sub-section 4.1.6.8;
 - (b) The cylinders shall be marked and labelled in conformity with sub-sections 5.2.1 and 5.2.2;
 - (c) All relevant requirements with regard to filling requirements and testing periodicities of P200 shall be fulfilled; and
 - (d) The following entry shall be made in the transport document: “Carriage in accordance with Special Provision 6XX”.”.

9. Add SP 6XX against all entries for gases in Table A of Chapter 3.2 with classification codes 1A and 1O.

Justification

10. Safety will be enhanced by permitting transport of these cylinders to filling centres and inspection bodies which have the necessary expertise.
