

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 4 of the provisional agenda

Harmonization with the United Nations Recommendations on the Transport of Dangerous Goods

Comments on ECE/TRANS/WP.15/AC.1/2013/31 and /Add.1 - Report of the Ad Hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods

Submitted by the Government of Romania

Introduction

1. The Romanian delegation did not participate to the extensive effort made by the Harmonization Working Group, and we would like to take this opportunity to congratulate its members and the Secretariats for their outstanding work. Nevertheless, we would like to present a few editorial comments and proposals.

Chapter 1.1

A. 1.1.3.10 (b) (i)

2. In addition to the very accurate observations made by the WG in relation to 1.1.3.10 (b) (i) in paragraphs 8 and 9, we would like to point out that “quality management systems”, such as ISO 9001:2008, certify the manufacturing processes and working procedures within the company, and not the final product of the process – e.g. lamps.

Proposal

3. Thus, we consider that the wording “**are certified**” should be replaced with “**are manufactured under**”, as stated in SP 373 (a) (iii).

B. 1.1.3.10 (d)

Proposal 1

4. In the English version, replace “**they are packaged**” with “**they are packed**”.

5. There is also a slight difference in the wording used in French and English for the last sentence.

(EN) “the projectile effects of any rupture of the bulb will be contained within the package.”

(FR) “les effets de projection liés à une rupture de l’ampoule soient confinés à l’intérieur du colis.”

Proposal 2

6. In the French version, replace “soient confinés” with “soient contenus”

Chapter 1.2

C. “Large salvage packaging”

7. If the SCETDG considers it necessary to keep the definition of the “*Large salvage packaging*” (see paragraph 10 of ECE/TRANS/WP.15/AC.1/2013/31), then the following amendments are necessary:

8. The scope of the “*Large salvage packaging*” definition should also include “non-conforming dangerous goods packages”, in order to have a similar wording with the “*Salvage packaging*”

Proposal

9. Amend the last part of the definition “*Large salvage packaging*”, as follows (stricken out text is deleted, bold underlined text is added):

“into which damaged, defective, ~~or~~ leaking or non-conforming dangerous goods packages, or dangerous goods that have spilled or leaked are placed for purposes of carriage for recovery or disposal;”.

Consequential amendment

10. In the brackets following the “*Packaging*” definition, insert “*Large salvage packaging*” after “*Large packaging*”.

D. “Radiation detection system”

Proposal

11. In the English version of the “*Radiation detection system*” definition, insert “neutron” before “radiation detectors”, in order to comply with the French version of the text.

Chapter 1.6

E. 1.6.6.1 (a) and 1.6.6.3 (a) (EN)

Proposal

12. In order to ensure consistency with the French versions of 1.6.6.1 (a) and 1.6.6.3 (a), in the English texts, replace “May continue **in carriage**” with “May continue **to be carried**”.

F. 1.6.6.2.1,**First sentence of 1.6.6.2.1 (EN), Proposal 1**

13. Replace “shall meet the requirements of RID/ADR in full” with “shall meet all the requirements of RID/ADR,”.

1.6.6.2.1 (a) (FR), Proposal 2

14. In order to ensure consistency with the English version of 1.6.6.2.1 (a), in the French text, insert “de colis” after “suivant un modèle”.

1.6.6.2.1 (g) (i) (EN), Proposal 3

15. Replace “would not exceed” with “does not exceed”, in order to comply with the French version.

Chapter 1.7**G. 1.7.1.4 (EN)****Proposal**

16. Insert “articles and substances” after “any of the following”, in order to have a similar wording with the French text.

H. 1.7.1.5.1 (EN)**Proposal**

17. In the new text, replace “and” by “or”.

I. 1.7.3.1, last paragraph (EN)**Proposal**

18. Rephrase the last paragraph of 1.7.3.1, as follows:

“Where competent authority agreement or approval is required, such agreement or approval shall take into account and be contingent upon the adequacy of the management system.”.

Chapter 2.2**J. 2.2.3.1.4, option 1**

19. The wording used in 2.2.3.1.4- option 1 with regard to *assignment* to packing groups, both in English and in French, is not consistent with the one used currently in RID/ADR.

Proposal 1

20. In 2.2.3.1.4, in English, replace “may be placed in” with “may be assigned to”.

Proposal 2

21. In the French version, replace “peuvent être classés dans” with “peuvent être affectés à”.

K. 2.2.51.1.6 and 2.2.51.1.7

Proposal

22. Replace “oxidizing solids” with “oxidizing solid substances” twice, in the title preceding 2.2.51.1.6 and at the beginning of paragraph 2.2.51.1.7, in order to comply with the French wording.

L. 2.2.7.1.3

Proposal

23. The wording in English of subparagraph c) “Material with fissile nuclides” would better reflect the meaning of the French text if worded as follows: “Material containing fissile nuclides”.

Further comments

24. As the issue is going to be opened in the discussion between Secretariats, we would like to know if the phrase “less than a total of 2.5 g” refers to the “fissile nuclides”, as we interpret the French text or the “material with fissile nuclides” as we tend to interpret the English text.

Chapter 3.3

M. SP 377 (EN)

Proposal

25. In the English version of SP 377, in the last paragraph, replace “packaged” with “packed”.

Chapter 3.4

N. 3.4.7.1, third paragraph (FR)

Proposal

26. In the third paragraph of 3.4.7.1 in the French version, replace the word “le symbol” with “le marquage”.

O. 3.4.8.1, antepenultimate sentence of the last paragraph (EN)

Proposal

27. Amend the antepenultimate sentence of the last paragraph as follows:

“The symbol “Y” shall be placed in the center of the mark marking...”

P. 3.4.9 (EN&FR)

Proposal

28. Insert “in limited quantities” after “packagings containing dangerous goods”, in the English text.

29. Insert “en quantités limitées” after “Les colis contenant des marchandises dangereuses”.