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RID/ADR/ADN

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods (Bern, 23 - 27 March 2015)

Item 4 of the agenda: Interpretation of RID/ADR/ADN

Enquiry regarding the interpretation of sub-sections 1.1.3.2 (c) and 1.1.3.1 (b)

Transmitted by Germany

SUMMARY

Executive Summary:	Enquiry regarding the interpretation of sub-sections 1.1.3.2 (c) and 1.1.3.1 (b).
Action to be taken:	Clarify the interpretation issues.
Related documents:	None.

1. In Germany, questions have been raised regarding the exemption for gases in accordance with sub-sections 1.1.3.2 (c) and 1.1.3.1 (b) of RID/ADR; Germany would like to enquire as to the opinion of the RID/ADR/ADN Joint Meeting concerning these questions.
2. In accordance with sub-section 1.1.3.2 (c) of RID/ADR, the provisions laid down in RID/ADR do not apply to the carriage of "*Gases of Groups A and O (according to 2.2.2.1), if the pressure of the gas in the receptacle or tank at a temperature of 20 °C does not exceed 200 kPa (2 bar) and if the gas is not a liquefied or a refrigerated liquefied gas. This includes every kind of receptacle or tank, e.g. also parts of machinery and apparatus*".

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3. In accordance with sub-section 1.1.3.1 (b), the provisions laid down in RID/ADR do not apply to *“The carriage of machinery or equipment not specified in this Annex and which happen to contain dangerous goods in their internal or operational equipment, provided that measures have been taken to prevent any leakage of contents in normal conditions of carriage;”*.
4. This leads to the following questions:

Question 1:

Since the exemption in accordance with sub-section 1.1.3.2 (c) of RID/ADR only refers to gases of Groups A and O, the exemption does not apply to flammable or toxic gases. Does that mean that the carriage of flammable or toxic gases contained in equipment is not permissible even under the exemption provision in sub-section 1.1.3.1 (b) of RID/ADR?

Question 2:

Can the exemption in accordance with sub-section 1.1.3.1 (b) be applied to gases at all, or is the more specific provision in accordance with sub-section 1.1.3.2 of RID/ADR applicable in all of these cases, as it includes every kind of machinery and apparatus parts?
