



INF. 30

16 September 2016

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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
(Geneva, 19 - 23 September 2016)

Agenda item 5 (a): Proposals for amendments to RID/ADR/ADN – Pending issues

Comments and position of UIP regarding informal document INF. 18 (EASA)

Transmitted by the International Union of Wagon Keepers (UIP)

General

1. At the March session of the Joint Meeting UIP presented informal document INF.50 concerning proposal 2 in EASA's document OTIF/RD/RC/2016/3 – ECE/TRANS/WP.15/AC.1/2016/3.
2. During the discussion on this issue, UIP recognised that even with the amended wording, the new text is not clear, so UIP withdrew its informal document INF.50.
3. EASA's informal document INF.18 still contains the wording from UIP's document INF.50. However, in order to make UIP's position clear, we would like to repeat that we believe that only those participants that have physical contact with tank-containers, portable tanks or railway tank-wagons during the transport process should be required to have a "safety adviser" in their organisation.
4. For tank-wagons, the tank-wagon operator according to RID 1.4.3.5 RID is only involved in the transport process of the wagon in some very special cases (e.g. when sending empty and cleaned wagons to a workshop). The tank-wagon operator never physically operates the wagon (e.g. loading, filling, unloading etc.).
5. Thus the position of UIP is that a tank-wagon operator in accordance with RID 1.4.3.5 does not need to have a safety adviser in his organisation.

6. For this reason UIP cannot support EASA's informal document INF.18 and asks the Joint Meeting to reject the proposal.
7. Unfortunately, UIP is unable to participate at the Joint Meeting in September 2016. If the Joint Meeting comes to a different conclusion than that set out above, we kindly request that the final decision be postponed to a future meeting in order to give UIP the opportunity to present its opinion and participate in the discussion directly.
