

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
(Seventy-eight session, agenda item 6,
Geneva, 9-13 May 2005)

Section 7.5.1 – General provisions concerning loading, unloading and handling

Comments on TRANS/WP.15/2005/1 (Belgium)

Transmitted by the International Road Transport Union (IRU)

The IRU fully supports the proposal made by the Belgian government in TRANS/WP.15/2005/1 to ensure that container handlers assume their responsibilities.

The IRU believes however that considering the handling of containers as a loading or unloading operation in the context of 7.5.1 ADR is a step in the right direction but it is not sufficient to solve daily problems in practice. A definition of a transshipper and a description of his responsibilities are necessary.

Proposal

To introduce a new definition under 1.2.1 of a transshipper and to use the reserved subsection 1.4.3.5 to define his responsibilities.

1.2.1

“Transshipper”, the enterprise that handles a container, a tank-container or a portable tank to transfer from a road vehicle onto a railway wagon, ship or inland waterway vessel, or to transfer them from a railway wagon, ship or inland waterway vessel onto a road vehicle;

1.4.3.5

In the context of 1.4.1, the transshipper has the following obligations in particular:

- (a) he shall ascertain that the goods are authorised for the transport mode(s) concerned;
- (b) he shall ascertain visually that containers, tank-containers or portable tanks have no obvious defects, leakages or cracks, missing equipment, etc.;
- (c) he shall ascertain that the orange markings and placards or danger labels have been affixed in accordance with regulatory provisions.
