

## **Economic Commission for Europe**

### **Inland Transport Committee**

#### **Working Party on the Transport of Dangerous Goods**

##### **Joint Meeting of the RID Committee of Experts and the**

##### **Working Party on the Transport of Dangerous Goods**

Bern, 22–26 March 2010

Item 5 (b) of the provisional agenda

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

### **Comments on the proposal to clarify the obligations of the filler with regards to checking closures (doc ECE/TRANS/WP.15/AC.1/2010/5 and in particular INF.8)**

#### **Transmitted by the European Chemical Industry Council (CEFIC)**

1. Further to our comments in informal document INF.16 on ECE/TRANS/WP.15/AC.1/2010/5, CEFIC has the following comments on informal document INF.8 of Germany. Based upon the results of the DGMK report the focus should be put on effective controls of the external closures rather than the internal stop valves.
2. Indeed, a check of the internal stop valve after filling/discharging is technically not always possible and causes a lot of technical and operational. Visual checks of the internal stop valve could furthermore conflict with other regulations dealing with the protection of the health of people and of the environment.
3. Effective controls can be carried out only by a visual check of the external closures after filling/dischARGE after having removed the closing device and by visually checking the leakproofness of the external stop valve.
4. As already mentioned in informal document INF.16 the DGMK report states that for more than 99% of the transports checked no leakages have been detected. Hence any further measures should have a focus on more effective controls and sanctions for the few non-compliant cases rather than creating additional, disproportionate effort for already compliant shipments.
5. The other proposals made in the DGMK report should therefore require more attention, as stated in our informal document INF.16.
6. In view of the above CEFIC recommends taking a pragmatic approach and, if a change has to be made in the regulations, proposes amending the proposal made in informal document INF.8 by Germany as follows:
7. Replace the word “nearest” by “farthest” (in 3 places).