

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

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Item 2 of the provisional agenda

Tanks

Holding time — Information in transport document

Transmitted by the Government of Belgium

Introduction

Summary

Executive summary: The information in the transport document concerning the holding time should also apply to portable tanks.

Action to be taken: RID/ADR 2017, 5.4.1.2.2 (d)

Introduction

The new 5.4.1.2.2 (d) in RID/ADR 2017 stipulates as follows:

“In the case of (RID only:) tank-wagons and (RID/ADR:) tank-containers carrying refrigerated liquefied gases the consignor shall enter in the transport document the date at which the actual holding time ends, in the following format : “END OF HOLDING TIME :(DD/MM/YYYY)”.

The previous edition of RID already contained a similar obligation, which was also applicable to portable tanks:

RID (2015):

5.4.1.2.2 (d) “In the case of tank-wagons, **portable tanks** and tank-containers containing refrigerated liquefied gases, the consignor shall enter in the transport document:

“THE TANK IS GUARANTEED AS INSULATED IN ORDER THAT THE SAFETY VALVES CANNOT OPEN BEFORE ... (date accepted by the carrier)”.

For people dealing with transport documents in multimodal terminals and railways undertakings, it is not easy to distinguish between tank-containers and portable tanks.

Proposal

Add “portable tanks” to the new 5.4.1.2.2 (d):

“In the case of tank-wagons, **portable tanks** and tank-containers carrying refrigerated liquefied gases the consignor shall enter in the transport document the date at which the actual holding time ends, in the following format :
“END OF HOLDING TIME :(DD/MM/YYYY).”

Justification

As prescriptions for the “holding time” also exist in chapters 4.3 and 6.7 for portable tanks (see 4.2.3.7 and 6.7.4.2.8), we see no reason to exclude portable tanks from 5.4.1.2.2 (d).

There is no justification to treat portable tanks and tank-containers in a different way. Different requirements for the transport document can cause difficulties and confusion in terminals and for carriers, as the staff handling the transport documents are not necessarily near the wagons/vehicles concerned and do not know if they are dealing with portable tanks or tank-containers.

The previous edition of RID required similar information in the transport document for portable tanks as well.
