Working Party on the Transport of Dangerous Goods (Sixty-ninth session, Geneva, 13-17 November 2000)

Restructured RID/ADR

Guidelines for transition period

CEFIC proposal

The new restructured RID/ADR will enter into force on 1 July 2001 with a 18 months transition period allowing the use of the former RID/ADR requirements up to 1 January 2003.

The decision to adopt such an abnormally long transition period (usually limited to 6 months) was taken in view both of the extent of the redrafting and restructuring included in the new RID/ADR as well as of the late availability of the final version.

More time will be needed indeed both for the <u>translation</u> of this totally new version of the regulation in all European languages, for the <u>apprenticeship</u> of the users as well as for the <u>amendment</u> of the probable larger amount of errors unavoidable in the frame of such a complex process (Inf paper n°4 of Belgium at the last Joint meeting illustrates well this last type of future problem).

We should not forget that, once the complete version of the new RID/ADR will be available (?), the content will still have to be rechecked carefully by all final users to detect and correct the deviations and discrepancies that have escaped to the attention of the authors of the global redrafting and that this process may not be completed for the 1 July 2001.

The priority target for all, during this transition period, is obviously to switch as soon as feasible to the new regulation. The best way to achieve this goal is to allow a full flexibility during the transition period i.e. the implementation of any new specific requirements independently of the others. This is absolutely necessary not only for chemical manufacturers but especially for distributors and hauliers who transport dangerous goods coming from different shippers. Such a flexibility approach will be by no way detrimental to safety.

A more rigid approach consisting in allowing only the use of either the entirety of the new or the entirety of the old requirements will be detrimental to the above mentioned target and would favour postponing the application of the new regulation at the latest.