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INLAND TRANSPORT COMMITTEE

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REPORTS OF INFORMAL WORKING GROUPS

Comments on the Report of the informal working group on the safety obligations of unloaders

Transmitted by the Government of Sweden

SUMMARY	
Executive Summary:	The proposed text in 1.4.3.x.1 concerning obligation for unloaders should also cover discharging of goods, particularly to ascertain that the right goods are discharged, and to minimize the risk for overfilling.
Action to be taken:	Amend the text in the proposed sub-section 1.4.3.x.1
Related documents:	ECE/TRANS/AC.1/2009/15

Background

The Government of Sweden supports the principles in the proposals from the working group, presented in document 2009/15. We would, nevertheless, like to add some text to the proposed sub-section 1.4.3.x.1 to ascertain that correct goods are discharged, and to minimize the risk for overfilling.

In Sweden, we have had a number of accidents involving discharging of tank-vehicles. In these cases the unloader has not observed the filling volume ordered, and has been overfilling the stationary tank/cistern with a large outflow as a result. We have also had accidents where the unloader has discharged a wrong tank compartment, causing a chemical reaction which has completely destroyed the stationary tank.

We are aware of the fact that the proposals from the working group deals with the texts in Chapters 1.2 and 1.4. However, if these proposals are adopted, we believe it might be necessary to also study and revise the text in Section 7.5.1 in order to harmonize the texts.

Proposal

Amend the text proposed in document 2009/15 as follows (changes underlined):

"1.4.3.x.1   In the context of 1.4.1, the unloader shall in particular:

(a)   Ascertain that the correct goods <u>and volume</u> are to be unloaded <u>or discharged</u> by comparing the relevant information on the transport document with the package/container/tank/MEMU/MEGC markings;"

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