

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

17 March 2011

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Bern, 21–25 March 2011

Item 1 of the provisional agenda

Adoption of the agenda

Transmitted by the Government of France

Comments on the document ECE/TRANS/WP.15/AC./2011/11 transmitted by the government of Sweden

Introduction

1. France agrees with the intention of Sweden to harmonise RID/ADR by turning the first sentence in sub-section 4.2.1.9.1 and the last sentence in 4.2.4.5.5 into passive form.
2. Yet the issue raised by Sweden made us notice several other confusions in Chapter 4.2.
3. France approves the idea of amending the first sentence in sub-section 4.2.1.9.1 in RID/ADR as proposed by Sweden, but the second sentence shall also be amended into passive form to avoid any confusion.
4. The same problem appears in the last sentence in sub-section 4.2.4.5.5, and we suggest to turn this sentence into passive form as well.
5. France is willing to propose the same amendments to UN Model regulations in order to harmonise the wording and clarify the situation. Besides, sub-sections 4.2.2.7.1 and 4.2.3.6.1 in UN Model regulations shall also be amended in order to delete any problems of interpretation.

Proposal

5. Amend the first sentence in sub-section 4.2.1.9.1 in RID/ADR to read as follows:
"4.2.1.9.1 Prior to filling, the portable tank shall be inspected to ensure that it is authorized for the substances to be carried and that the portable tank is not loaded with substances which in contact with the materials in the shell, gaskets, service equipment and any protective linings, are likely to react dangerously with them to form dangerous products or appreciable weaken these materials. The manufacturer of the substance in conjunction with the competent authority may be consulted for guidance on the compatibility of the substance with the portable tank materials".
6. Propose amendments to UN Model regulations in order to turn all the sentences into passive form in sub-sections 4.2.1.9.1, 4.2.2.7.1, 4.2.3.6.1, 4.2.4.5.5.

Justification

Safety: No change in safety. An editorial issue.

Feasibility: No problem.

Practical implications: Makes it possible to avoid problems of interpretation.
