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PROPOSAL FOR AMENDMENTS TO ANNEX A OF ADR AND TO RID

Prohibitions on mixed loading, paragraph 7.5.2.2, Note (a)

**Transmitted by the International Federation of Freight Forwarders
Associations (FIATA)**

- Executive summary:** Paragraph 7.5.2.2, Note (a) clearly states that an approved container/compartments must be used for either articles of compatibility group B or for substances and articles of compatibility group D, if mixed loading is applied.
- Action to be taken:** Amendment to paragraph 7.5.2.2, Note (a) of Annex A to ADR and to RID
- Related documents:** TRANS/WP.15/AC.1/1999/16

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Introduction

Paragraph 7.5.2.2, Note (a) stipulates:

Packages containing articles of compatibility group B and substances and articles of compatibility group D may be loaded together on one *vehicle/wagon* provided they are carried in separate containers/compartments of a design approved by the competent authority or a body designated by it, such that there is no danger of transmission of detonation from the articles of compatibility group B to the substances or articles of compatibility group D.

When this text was adopted, the intention was to prevent transmission of detonation without requiring separate containment systems for both compatibility groups B and D. This can be achieved by keeping one of the compatibility groups in a separate containment system. However, the present text indicates that two containment systems of an approved design must be used.

In relation to segregation, the term “containment systems” instead of “container” should be used so as not to confuse with the normal use of the term “container” (large or small) in RID and ADR.

Safety aspects are satisfied if only one containment system is used. There is no need to use two containment systems.

Proposal

Amend the text in paragraph 7.5.2.2, Note (a) to read as follows:

“Packages containing articles of compatibility group B and substances and articles of compatibility group D may be loaded together on one vehicle (RID: wagon) or in one container provided they are effectively segregated such that there is no danger of transmission of detonation from the articles of compatibility group B to the substances or articles of compatibility group D. Segregation shall be achieved by the use of separate compartments or the packing of one or both of the two types of explosive in containment systems. The method of segregation shall be to a design type approved by the competent authority or a body designated by it.

Justification

Safety: Safety is fulfilled by using one containment system for one of the compatibility groups only.

Feasibility: The amendment would remove major difficulties for freight forwarders and carriers without lowering the safety standard.

Enforceability: Would not cause any problems.
