



**Economic and Social
Council**

Distr.
GENERAL

TRANS/WP.15/AC.1/2003/2
8 August 2002

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern, 24-28 March 2003)

PART 7 OF RID/ADR

CHAPTER 7.2: PROVISIONS CONCERNING CARRIAGE IN PACKAGES

Transmitted by the Government of Norway */

SUMMARY

Executive Summary:	Provision “V/W 7” of 7.2.4 gives rise to problems of interpretation and practical problems for transport operators. Norway has raised this issue in proposals at the seventieth and seventy-first sessions of the Working Party on the Transport of Dangerous Goods (WP.15). WP.15 asked Norway to raise this issue with the Joint Meeting, since it will have implications for both the road and rail modes.
Action to be taken:	Delete the text of provision “V/W 7”, and introduce a new “CV/CW” with operational requirements instead of the present technical requirement for the construction of vehicles/wagons and containers.
Related documents:	TRANS/WP.15/2001/19 and Rev. 1

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Introduction

Provision “V/W7” of 7.2.4 requires closed vehicles and closed containers carrying gases to “be provided with adequate ventilation”. This requirement creates problems both by its rather general way of stating a requirement and in practice when trying to fulfil the requirement.

Firstly, one is not able to set a sensible minimum requirement for such “adequate ventilation”, which leaves it open to interpretation by anyone involved, including control personnel on the road. Secondly, many transport operators in the Scandinavian countries are not willing to modify their containers and swap bodies to cope with such a requirement. This unwillingness is based mainly on the fact that under the Nordic climate, having openings in the containers and swap bodies will restrict the types of cargo that can be transported in them due to temperature restrictions for the cargo. In Norway, this had lead to a situation where it has become extremely difficult to transport gases in cylinders.

Furthermore, no such requirement exists in the IMDG code, and in a country with lots of combined land/coastal transport, such special, technical requirements for multimodal transport equipment create problems.

Proposal

1. Delete “V/W 7”;
2. Introduce a new “CV/CW xy” for every substance that presently attracts “V/W 7”, with the following text introduced in 7.5.11:

“CV/CW xy If packages are carried in closed vehicles/wagons or containers, the doors of the vehicles/wagons or containers shall be marked with the following:

“Toxic or flammable gases/vapours or oxygen enriched or depleted atmosphere may be present. Appropriate precautions shall be taken before entering.”

The text shall be readily visible and legible, and drafted in a language appropriate to the consignee.”

3. If this proposal is carried, as a consequence, the text of “VV 3” in ADR should also be changed by deleting the words “... with adequate ventilation” at the end of the sentence.

In the opinion of the Government of Norway, it is superfluous to require ventilation on a sheeted vehicle/wagon or container.
