

NEW PROPOSALS OF AMENDMENTS TO RID/ADR/ADN

Belgian comments to document TRANS/WP.15/AC.1/2005/11

During the RID/ADR Joint Meeting of September 2004, the Austrian document TRANS/WP.15/AC.1/2004/18 was discussed. The conclusions that the representation of Belgium drew from the discussion were the following :

1. the consignment note/transport document for the transport of empty, uncleaned means of containment has to transmit in a clear and unambiguous manner all the elements of information that are required according to 5.4.1.1.1 and 5.4.1.1.6.1 or 5.4.1.1.6.2 ;
2. the introduction of two alternatives for the content of the consignment note/transport document for the transport of empty, uncleaned means of containment would create confusion and increase the possibilities for errors ;
3. there is no real benefit in the proposed alternative, except when it creates the possibility to re-use the original consignment note/transport document (of those means of containment when they were full) ;
4. when the empty, uncleaned means of containment have to be transported to anyone else than their consignor when they were full, or the return trip is not taking place immediately by means of the same wagon/vehicle, there is not much benefit in re-using the original consignment note/transport document (at least three changes are necessary) ;
5. in the case of a round trip (immediate return to the original consignor, with consignee becoming consignor and vice-versa) adding a short and simple statement on the original consignment note/transport document can be sufficiently clear, but the possibility to re-use the original consignment note/transport document should be limited to such cases.

A possible text that would take account of the above could be :

5.4.1.1.6.3 When empty means of containment, uncleaned, which contain the residue of dangerous goods other than those of Class 7, are returned to the consignor of those dangerous goods, the consignment notes/transport documents relevant to the carriage of these means of containment when filled may be used instead of those in accordance with 5.4.1.1.6.1 or 5.4.1.1.6.2. In such cases the indication of the quantity in accordance with 5.4.1.1.1 (f) is to be replaced by "EMPTY, UNCLEANNED RETURN".
