RID/ADR


Use of the terms "filler", "packer" and "consignor"

Transmitted by the Secretariat of OTIF

When checking the texts for harmonising with the 14th edition of the UN Model Regulations at the 42nd session of the RID Committee of Experts (Madrid, 21 – 25 November 2005), it was decided to refer to the question of the use of the terms “filler”, “packer” and “consignor” to the RID/ADR/ADN Joint Meeting.

The relevant paragraphs of the report of this session (document A 81-03/501.2006) are reproduced below. The Joint Meeting is requested to give its opinion on this problem.

4.1.3.6.7 (Inspection of pressure receptacles for liquids and solids)

8. The Secretariat pointed out that in the last sentence of this paragraph, as in the first sentence, the term "packer" should be used instead of "consignor", as according to the assignment of obligations in Chapter 1.4, inspection of the leakproofness of the closures and equipment was more the responsibility of the packer.

9. While some delegates supported this proposal, other delegates preferred a passive formulation in order to change the text taken from the UN Recommendations as little as possible. As it was not possible to anticipate whether WP.15 would follow this amendment, the text remained unchanged. The Joint Meeting was asked to check the assignment of obligations in 4.1.3.6.7 and in 4.1.6.5 of the current text.
10. The representative of Austria will submit a proposal to the UN Sub-Committee of Experts to do away with the allocation of specific obligations in the UN Recommendations and to leave it to the mode-specific provisions to deal with this.

6.2.4.3.2.2.3 (Alternative test methods for aerosol dispensers)

16. Although in RID/ADR the filler is only the person who fills dangerous goods into tanks or dangerous goods in bulk, the RID Committee of Experts decided not to replace the term "filler" with "packer" or "filler of the aerosol dispenser" in 6.2.4.3.2.2.3. This problem too should be brought to the attention of the Joint Meeting (see also paragraphs 8 to 10).