Proposal by the Government of Belgium concerning paragraph 6.8.3.2.3

Introduction

Recently, there have been discussions in Belgium concerning the correct interpretation of paragraph 6.8.3.2.3 in RID/ADR:

6.8.3.2.3 Filling and discharge openings of tanks with a capacity greater than 1 m³ intended for the carriage of liquefied flammable and/or toxic gases shall be equipped with an instant-closing internal safety device which closes automatically in the event of an unintended movement of the shell or of fire. It shall also be possible to operate the closing device by remote control.

An internal non-return valve, installed in the filling opening, is considered by some to meet these provisions because:

1. 6.8.3.2.3 would only be applicable to filling openings that are, or may be used, as discharge openings as well;
2. an internal non-return valve would fulfil the requirements of 6.8.3.2.3 for the instant-closing internal safety device.

For obvious reasons, Belgium is of the opinion that this point of view is not correct and proposes to introduce some clarifications to the text of 6.8.3.2.3, in order to avoid this misinterpretation in the future.

Proposal

Amend 6.8.3.2.3 to read:

“All filling and all discharge openings of tanks with a capacity greater than 1 m³ intended for the carriage of liquefied flammable and/or toxic gases shall be equipped with an instant-closing internal safety device which closes automatically in the event of an unintended movement of the shell or of fire. It shall also be possible to operate the closing device by remote control.

NOTE: A non-return valve may not be used as an internal safety device to fulfil the provisions of this paragraph.”