

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Bern, 25-28 March 2008
Agenda item 5 (a)

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

Belgian comments on document ECE/TRANS/WP.15/AC.1/2007/35

Introduction

In spite of the efforts made, Belgium is of the opinion that some additional changes have to be made to the definition of the unloader and to the list of his obligations :

1. The enterprise that unloads dangerous goods from a small container also has to be considered as an unloader. The responsibilities in connection with the unloading from a large or from a small container, for instance, obviously ought to be the same.
2. In the second indent of the definition of unloader, the rail wagons have been forgotten. Also, a slightly simplified wording is possible.
3. It is simply impossible to check that the goods concerned correspond to the documentation (a well-equipped laboratory, a highly qualified staff and lots of time at the unloading site would be required to do so). In many cases, even a comparison of the UN-numbers on the packagings with the ones mentioned in the transport document will require more time than what is available.

Proposals

1. Change the definition of unloader in paragraph 1.2.1 as follows :

““**Unloader**” means any enterprise which :

- unloads packaged dangerous goods from a vehicle/wagon or a ~~large~~ container, or
- which discharges dangerous goods from a tank (tank-vehicle/tank-wagon, demountable tank, portable tank, ~~or tank-container~~) ~~or from a~~ , battery-vehicle/battery-wagon or MEGC) and/or from a vehicle/wagon , ~~large container~~ or ~~small container for carriage~~ when carried in bulk;”

2. Change the proposed new paragraph 1.4.3.x (a) as follows :

(a) check the documentation and markings to verify that the correct good(s) is(are) being unloaded ;