

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

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#### Work of the RID/ADR/ADN Joint Meeting

### Additive devices – Comments on INF.9 (Belgium)

#### Transmitted by the Government of Austria

#### Introduction

1. In 2007/2008 Austria tried to establish provisions for additive devices, regarding them as part of the service equipment of the tank and requiring a few additional measures such as marking and notes in the transport document and the certificate of approval. The proposals were dismissed mostly because of their very broad scope.
2. The aim of INF.9 is similar but it restricts the admissibility of additive devices to certain UN-numbers or non-dangerous goods as additives and a few UN-numbers as load in the tank. As this should be easier now to be agreed on, Austria supports INF.9 in principle.
3. However, a new problem arises from this restriction. The beginning of the proposed special provision reads “Fixed tanks (tank-vehicles) and demountable tanks used for the carriage of substances under this entry may be equipped with additive devices.” This means that tanks with additive devices may be used for substances to which this special provision has been added in column 6 of 3.2 Table A and e contrario for no others.
4. Austria holds the view that the usability of the tank should remain the same irrespective of whether it is equipped with an additive device or not. Only the use of this device should be restricted to the cases mentioned in the table and the special provision itself.

#### Proposal

5. The beginning of the special provision (para. 10 in INF.9) should therefore read:  
"XYZ      When substances under this entry are carried in fixed tanks (tank-vehicles) or demountable tanks, additive devices may be used for the carriage and admixture of additives. When other substances are carried in the tank, the same requirements concerning the additive devices apply, yet admixture of additives is not allowed.  
Additive devices: (...)"

#### Editorial remark

6. INF.9 Para. 10 (d) reads “Marking, labelling and placarding provisions for the means of containment of additive devices (...) (iii) In case of a) (iii), not applicable.” This

could be misunderstood that no marking at all might be necessary for removable packagings. Austria would therefore prefer the wording “Marking, labelling and placarding provisions for the means of containment being part of additive devices (...)” and to delete “(iii) In case of a) (iii), not applicable.”

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