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, 13-17 March 2017

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:**

- new proposals

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**The need to correct Chapters 1, 2, 4, 5, 6**

Transmitted by the Government of the Russian Federation

**Introduction**

The analysis of the text of the RID/ADR-2017 has shown that there are separate paragraphs that need to be correct and clarified, since in present form, in our opinion, may lead to an erroneous interpretation or mislead the user of the Rules.

See table data:
<table>
<thead>
<tr>
<th>Text of RID-2017</th>
<th>Comment</th>
<th>Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> 1.1.4.2.3 (Reserved) <strong>NOTE:</strong> For carriage in accordance with 1.1.4.2.1, see also 5.4.1.1.7. For carriage in containers, 5.4.2.</td>
<td>The paragraph is reserved, but there is a note</td>
<td>Delete the brackets. Delete the word &quot;Note&quot;. Text of the note to make the text of the paragraph</td>
</tr>
<tr>
<td><strong>2</strong> 2.2.7.2.4.6 Classification as Type B(U), Type B(M) or Type C packages 2.2.7.2.4.6.1 Packages not otherwise classified in 2.2.7.2.4.1 to 2.2.7.2.4.3 shall be classified in accordance with the competent authority certificate of approval for the package issued by the country of origin of design.</td>
<td>In brackets there are subparagraphs included in the main paragraph</td>
<td>Delete paragraph 2.2.7.2.4. Delete the brackets, write the text as follows: «Packages not otherwise classified in 2.2.7.2.4.1 - 2.2.7.2.4.5…»</td>
</tr>
<tr>
<td><strong>3</strong> 2.2.9.1.3 Substances and articles classified in Class 9 are listed in Table A of Chapter 3.2. The assignment of substances and articles not mentioned by name in Table A of Chapter 3.2 to the relevant entry of that Table or of 2.2.9.3 shall be done in accordance with 22.5.14.25.22.3.14.14 below.</td>
<td>Reference to items that have been deleted or reserved:</td>
<td>Write the text as follows: «The assignment of substances and articles not mentioned by name in Table A of Chapter 3.2 to the relevant entry of that Table or of 2.2.9.3 shall be done in accordance with 22.9.1.4-22.9.1.8, 22.9.1.10, 22.9.1.11, 22.9.1.13, 22.9.1.14 below.»</td>
</tr>
<tr>
<td><strong>4</strong> 2.2.9.1.10.3.2 The classification scheme in Table 2.2.9.1.10.3.2 below summarizes the classification criteria for substances.</td>
<td>In our opinion, the text of link 15 has a dual interpretation.</td>
<td>Write the text as follows: «Special guidance is provided in the GHS (paragraph 4.1.2.13 and Annex 9, Section A9.6)»</td>
</tr>
</tbody>
</table>
The special provision TP3 is in paragraph 4.2.5.3:

To exclude the misconception of the user of the Rules, it is suggested to delete the last brackets.

Delete the word "Note". Text of the note to make the text of the paragraph

Write the text as follows: "This alternative marking shall conform to specifications set in this subsection except for the provisions concerning resistance to fire mentioned in this paragraph and 5.3.2.2.2."

In our opinion, the text of subparagraph (b) in brackets introduces the user into confusion. Write the text in brackets as follows: (see note to Chapter 6.3 and packing instruction P 621 of 4.1.4.1)

Reference to item that have been reserved: Write down the items as follows:

6.4.11.11 (Reserved)

Write down the items as follows:

«...6.4.11.4-6.4.11.10, 6.4.11.12-6.4.11.14...»
Write down the items as follows:
«...6.4.11.4-6.4.11.10, 6.4.11.12-6.4.11.14...»

Write down the items as follows:
«...6.4.11.8-6.4.11.10, 6.4.11.12, 6.4.11.13...»

Write down the items as follows:
«...6.4.11.8-6.4.11.10, 6.4.11.12, 6.4.11.13...»

The paragraph is reserved, but there is a note
Delete the brackets. Delete the word "Note". Text of the note to make the text of the paragraph

Reference to item that have been reserved:
Write as follows:
«The requirements of 6.8.2.2.1, 6.8.2.2.2, 6.8.2.2.4, 6.8.2.2.6-6.8.2.2.8 shall apply»

In our opinion, the text of last sentence introduces the user into confusion.
Write as follows:
«Vacuum-operated waste tanks shall comply with all requirements of Chapter 6.8, with exception of requirements overtaken by a special provision in Chapter 6.8.»

The last sentence sends to nowhere
Delete the last sentence and brackets.

A difficult reference to the special provision TE 22, located on the same page
The text in last brackets is written as follows: «(see also special provision TE 22)»
Shells of tank-wagons shall also be protected against the overriding of buffers and derailment or, failing that, to limit damage when buffers override by at least one of the following measures.

- The device to protect against the overriding of buffers shall not interfere with the normal functioning of the buffers (elastic or plastic deformation) (see also special provision TE.22 in 6.8.4 (b)).
The proposed amendments make it possible to exclude a double interpretation of the requirements of the Rules and their erroneous interpretation.