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, 18-22 March 2019  
Item 5 (b) of the provisional agenda  
Proposals for amendments to RID/ADR/ADN: new proposals  

Container/vehicle packing certificate

Transmitted by the Government of the Netherlands

Introduction

1. Section 5.4.2 of RID/ADR/ADN regulates the issuance of the container/vehicle packing certificate. If a carriage of dangerous goods in a container precedes a voyage by sea, this document shall be provided with the transport documents. The document certifies that the operation of packing or loading the dangerous goods has been carried out in accordance with the IMDG Code. Section 5.4.2 sets the requirements under which the transport documents and the container/vehicle packing certificate may be incorporated.

2. When there is no subsequent voyage by sea anticipated, it is not necessary to draft a container/vehicle packing certificate. Therefore, it can be concluded that the certificate should not be considered as a safety improving measure for the carriage of dangerous goods on the inland modes, so it is somewhat remarkable to require the carriage of this document during inland transport.

Considerations

3. Although section 5.4.2 has been forming an integral part of RID/ADR/ADN for a long period, the question was raised in the Netherlands whether the inland carrying industry should be tasked with this administrative requirement. It should also be possible to distribute the packing certificate for the container directly to the maritime carrier. Especially in the current digital era, it is imaginable that the loader or the packer (responsible for drafting the certificate) can provide directly the maritime carrier with the certificate.

Request

4. The Dutch delegation is interested to hear the opinions of the other delegations and invites the Joint Meeting to take action, as it deems appropriate. If desired, the Dutch delegation is willing to table a working document on this subject for the autumn 2019 session of the Joint Meeting.