

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

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Item 2 of the provisional agenda

Tanks

Dry Break Coupling

Transmitted by the Government of the Netherlands and UIP

Introduction

1. In the November 2020 meeting of the RID Committee of Experts' standing working group the Netherlands and UIP re-introduced the topic of the use of Dry Break Coupling (OTIF/RID/CE/GTP/2020/12). After a positive discussion in which the rationale behind the paper was supported, the working group was of the opinion that this paper needs to be discussed in the Joint Meeting. The representatives of the Netherlands and UIP were asked to submit the paper to the March 2021 meeting of the Joint Meeting considering the comments made during the discussion (see report OTIF/RID/CE/GTP/2020-A, paras. 26-28).

2. This topic was previously introduced in the September 2013 session of the Joint Meeting, where the Netherlands submitted informal document INF.29 (WP.15/AC.1/2013/INF.29). In that informal document the Netherlands sought clarification on the use of dry break couplings in relation to section 6.8.2.2.2 of RID/ADR. The following two issues were pointed out in that informal document:

- The use of dry break couplings as second closure;
- The compliance of this type of closure with section 6.8.2.2.2 RID/ADR because the position and/or direction of closure is not clearly apparent.

3. Informal document INF.29 was discussed in the Working Group on Tanks which met alongside the September 2013 session of the Joint Meeting. The report of the Working Group on Tanks noted the following result of the discussion (WP.15/AC.1/2013/INF.60/Rev.1):

'24. The Working Group considered the document from the Netherlands and recalled that in the past a positive advice had been given on the use of dry break couplings based on a question raised by Austria. The group confirmed that the use of dry break couplings is acceptable from a technical point of view as a second or third closure in series in accordance with 6.8.2.2.2. The nature of this coupling is that the "male coupling" on the tank is always closed unless connected to a matching "female coupling" and hence the requirements of 6.8.2.2.2 were deemed to be complied with. It was pointed out that some of these couplings are approved according to EN 14432. The group recognized that there could be room to improve the current wording to take these kinds of couplings into account in more detail and invited interested parties to submit a proposal at a later session if they felt it necessary.'

4. This discussion made it clear that the Working Group on Tanks is of the opinion that dry break couplings can be used as a second or third closure in series. The Working Group on Tanks was less direct in answering the second issue relating to the visibility of the position of the coupling. Based on the outcome of the discussion in the Working Group on Tanks, the Netherlands and UIP are of the opinion that the Joint Meeting considered this type of coupling is in compliance with 6.8.2.2.2 regarding the design of the coupling.

5. The Joint Meeting endorsed all decisions and conclusions of the Working Group on Tanks mentioned in the report (INF.60/Rev.1) forming an advice for the RID Committee of

Experts' standing working group. However, no formal decision on this issue has been taken. Until now, no amendments have been adopted as a result of the conclusions of the Working Group on Tanks.

6. In all discussions in 2013 and in the November 2020 meeting of the RID Committee of Experts' standing working group the use of these couplings was not questioned. It was noted that this type of coupling is widely implemented and in use. During the discussion in the RID Committee of Experts' standing working group the UIC noted also that the terms 'male part' and 'female part' are words not used in the regulation and does not provide enough clarification. Therefore, more general wording specifying the use of dry break couplings was used. Germany mentioned that it should be clarified that this type of couplings should not be used as a first closure (internal stop-valve) but as a second (external stop-valve) or third closure (closing device) only.

7. Some different views were expressed concerning the words 'and similar systems'. Some delegates were in favour to include these wordings to allow other systems with the same way of operation to be used. While other delegates indicated that these wordings are not clearly defined and could lead to misinterpretation. It should be discussed whether to include these or similar wordings; therefore two options are mentioned in this proposal.

8. The Netherlands and UIP are of the opinion that the RID/ADR could benefit from a clarification in the form of a footnote to the current text. This would solve the formal problem of having 'no indicator' that arise from the current wording. Therefore, the Joint Meeting is invited to discuss the following proposal.

Proposal

Add the following footnote after the 7th paragraph of section 6.8.2.2.2 RID/ADR:

Option 1:

"The mode of operation of dry break coupling is self-closing. Consequently, an open/closed indicator is not necessary. This type of closure can be used as a second or third closure."

Option 2:

*"The mode of operation of dry break coupling **and similar systems** is self-closing. Consequently, an open/closed indicator is not necessary. This type of closure can be used as a second or third closure."*
