

## **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**

**11 March 2021**

Bern, 15-19 March 2021

Item 6 of the provisional agenda

**Reports of informal working groups**

### **Comment on document ECE/TRANS/WP.15/AC.1/2021/9**

#### **Transmitted by the Government of France**

##### **Introduction**

1. First of all, France would like to thank EIGA for submitting this proposal.
2. The Joint Meeting supported in principle the proposal as amended in informal document INF.44 of the 2019 autumn session.
3. As a permanent solution has been found by adopting a reciprocal agreement between RID/ADR and the United States of America Department of Transportation (DoT), we believe the proposal is now ready for adoption.
4. However, in our view there is a gap concerning the carriage of damaged receptacles and receptacles whose time limit for periodic inspection has expired, because 1.1.4 exempts from the part of RID/ADR dealing with this.
5. We consider that some requirements similar to 4.1.1.6.10 should be included and, in addition, 4.1.6.12 and 4.1.6.13 shall also be satisfied:

“4.1.6.12 Receptacles shall not be offered for filling:

  - (a) when damaged to such an extent that the integrity of the receptacle or its service equipment may be affected;
  - (b) unless the receptacle and its service equipment has been examined and found to be in good working order; and
  - (c) unless the required certification, retest, and filling marks are legible.

4.1.6.13 Filled receptacles shall not be offered for carriage:

  - (a) when leaking;
  - (b) when damaged to such an extent that the integrity of the receptacle or its service equipment may be affected;
  - (c) unless the receptacle and its service equipment has been examined and found to be in good working order; and
  - (d) unless the required certification, retest, and filling marks are legible.”
6. To deal with that we offer proposal 1 below.
7. In addition the proposed text doesn't include the issue of sending back an empty uncleaned receptacle as the multilateral agreement M318 did. We also note that on the other hand CFR 49 covers "export without further filling" (see annex (3) (i) in document ECE/TRANS/WP.15/AC.1/2021/9). For a complete coverage on both sides, we offer proposal 2.

## Proposals

### Proposal 1

In the proposed 1.1.4.7.2, insert a paragraph (c) before the paragraph concerning the transport document:

- « (c) The provisions of 4.1.6.12 and 4.1.6.13 shall apply to pressure receptacles, and pressure receptacles shall not be filled after they become due for periodic inspection but may be carried after the expiry of the time-limit for purposes of performing inspection or disposal, including the intermediate carriage operations ».

Paragraph (c) becomes (d).

### Proposal 2

Modify the headline of 1.1.4.7.2 to read:

**“Export of gases and empty uncleaned pressure receptacles”.**

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