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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, 14 March – 18 March 2022
Item 2 of the provisional agenda
Tanks

Comments on notes to new 6.8.1.5.1 (a) and 6.8.1.5.4 (a) from ECE/TRANS/WP.15/AC.1/2021/23/Rev.1

Transmitted by the Government of the United Kingdom*, **, ***

- 1. Subsequent to the September 2021 session of the Joint Meeting, the United Kingdom has reflected further on the notes to new 6.8.1.5.1 (a) and 6.8.1.5.4 (a) adopted from informal document INF.48 as amended, and is of the opinion that as written these notes could be misinterpreted such that type examinations and initial inspections performed by an inspection body approved or recognized by the competent authority of a country of manufacture bound by the note to new 6.8.1.5 might not be accepted by a country of registration also bound by the note to new 6.8.1.5.
- 2. Given the risk of misinterpretation, the United Kingdom raised this issue at the intersessional meeting on 15 December 2021 of the members of the informal working group on the inspection and certification of tanks, and proposed amendments to the notes of new 6.8.1.5.1 (a) and 6.8.1.5.4 (a) to clarify the position.
- 3. However, during the discussions in the informal working group it became clear that whilst the proposals would be consistent with the application in RID of the amendments as proposed in ECE/TRANS/WP.15/AC.1/2021/23/Rev.1 and adopted at the September 2021 session, the amendments proposed by the United Kingdom to clarify the position were not necessarily appropriate for ADR. In conclusion the United Kingdom agreed to consider other options and to submit an informal document to the March 2022 session so that proposals to clarify the position could be considered before the 2023 editions of RID and ADR are finalized for publication.

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^{*} A/76/6 (Sect.20), para. 20.76.

^{***} This document was scheduled for publication after the standard publication date owing to circumstances beyond the submitter's control.