
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

Geneva, 12-16 September 2022

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN:

new proposals

30 August 2022

Exemption from appointing a safety adviser – ADR/RID 1.8.3.2 (b)

Transmitted by the Government of the United Kingdom

Introduction and justification

1. Provision 1.8.3.1 within ADR and RID requires the following participants – consignors, carriers, packers, fillers, loaders and unloaders – to appoint a safety adviser.
2. In the context of consignors, transitional measure 1.6.1.44 within ADR and RID, requires “undertakings which participate in the carriage of dangerous goods only as consignors and who did not have to appoint a safety adviser on the basis of the provisions applicable until 31 December 2018 [to]... appoint a safety adviser”. This transitional period ends on 31 December 2022.
3. However, the exemption from appointing a safety adviser within 1.8.3.2 (b) only covers the following participants: carriers, packers, fillers, loaders and unloaders. To note, this exemption does not currently include consignors.
4. To bring consistency to the applicability of exemption 1.8.3.2 (b) for all participants involved in carriage of dangerous goods, this exemption should also be afforded to consignors.
5. This informal document seeks to initiate a timely discussion on this issue at the Joint Meeting before the end of transitional measure 1.6.1.44, and to gauge support for the following proposed amendments to 1.8.3.3 (b) within ADR and RID, with an aim to bring a formal proposal to the next session.

Proposed amendments to ADR and RID

6. Amend ADR/RID 1.8.3.2 (b) (amendments are underlined) as follows:
“1.8.3.2 The competent authorities of the Contracting Parties may provide that these requirements shall not apply to undertakings:
 - (a)
 - (b) The main or secondary activities of which are not the consignment, carriage or the related packing, filling, loading or unloading of dangerous goods but which occasionally engage in the national consignment, carriage or the related packing, filling, loading or unloading of dangerous goods posing little danger or risk of pollution.”
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