

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, 20-24 March 2023

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN:

new proposals

9 March 2023

Consignor's duties in 4.1.3.6.7 and 4.1.6.5

Transmitted by the Government of Spain

Introduction

1. Paragraphs 4.1.3.6.7 and 4.1.6.5 mention obligations for the consignor of pressure receptacles that can only be carried out if the consignor is present during or after filling of these receptacles:

“4.1.3.6 Pressure receptacles for liquids and solids

4.1.3.6.7 Prior to filling, the packer shall perform an inspection of the pressure receptacle and ensure that the pressure receptacle is authorized for the substances to be carried and that the requirements of ADR have been met. Shut-off valves shall be closed after filling and remain closed during carriage. The consignor shall verify that the closures and equipment are not leaking.

4.1.6 Special packing provisions for goods of Class 2 and goods of other classes assigned to packing instruction P200

4.1.6.5 Prior to filling, the packer shall perform an inspection of the pressure receptacle or open cryogenic receptacle and ensure that the pressure receptacle or open cryogenic receptacle is authorized for the substance and, in case of a chemical under pressure, for the propellant to be carried and that the requirements have been met. Shut-off valves shall be closed after filling and remain closed during carriage. The consignor shall verify that the closures and equipment are not leaking.

NOTE: Shut-off valves fitted to individual cylinders in bundles may be open during carriage, unless the substance carried is subject to special packing provision ‘k’ or ‘q’ in packing provision P200.”

2. In principle, the consignor may, or may not, be present during or after filling the pressure receptacles; it does not seem reasonable to ask him to verify that the closures and equipment are not leaking systematically. It should be the loader that, before loading the pressure receptacles, verifies that closures and equipment are not leaking (see also obligations of the loader under 1.4.3.1.1(b)).

3. Therefore, the consignor should be eliminated as responsible for these processes, and the loader should be included instead.

4. Spain would like to ask the Joint Meeting about its view on this topic and would be looking forward to prepare a formal document for the next session.

Proposal

5. Amend 4.1.3.6.7 and 4.1.6.5 of RID/ADR to read as follows:

“4.1.3.6.7 Prior to filling, the packer shall perform an inspection of the pressure receptacle and ensure that the pressure receptacle is authorized for the substances to be carried and that the requirements of ADR have been met. Shut-off valves shall be closed after filling and remain closed during carriage. The ~~consignor~~ **loader** shall verify that the closures and equipment are not leaking.

4.1.6.5 Prior to filling, the packer shall perform an inspection of the pressure receptacle or open cryogenic receptacle and ensure that the pressure receptacle or open cryogenic receptacle is authorized for the substance and, in case of a chemical under pressure, for the propellant to be carried and that the requirements have been met. Shut-off valves shall be closed after filling and remain closed during carriage. The ~~consignor~~ **loader** shall verify that the closures and equipment are not leaking.

NOTE: Shut-off valves fitted to individual cylinders in bundles may be open during carriage, unless the substance carried is subject to special packing provision ‘k’ or ‘q’ in packing provision P200.”

