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, 25-28 March 2024
Item 5 (b) of the provisional agenda
Proposals for amendments to RID/ADR/ADN:
new proposals

Filling of multiple-element gas containers

Transmitted by the Government of Spain¹ ²

Introduction

1. Chapter 4.2 of RID/ADR specifically mentions the requirements for filling multiple element gas containers (MEGCs) in the following paragraphs:

*4.2.4.5 Filling

4.2.4.5.1 Prior to filling, the MEGC shall be inspected to ensure that it is authorized for the gas to be carried and that the applicable provisions of RID/ADR have been met.

4.2.4.5.2 Elements of MEGCs shall be filled according to the working pressures, filling ratios and filling provisions specified in packing instruction P200 of 4.1.4.1 for the specific gas being filled into each element. In no case shall an MEGC or group of elements be filled as a unit in excess of the lowest working pressure of any given element.

4.2.4.5.3 MEGCs shall not be filled above their maximum permissible gross mass.”

2. These multiple element gas containers referenced in Chapter 4.2 are UN MEGCs. Nevertheless, the general requirements of Chapter 4.1 and the specific requirements for other than UN MEGCs do not have so detailed requirements for filling MEGCs.

3. The requirements of 4.2.4.5 should be applicable not only for the filling of UN MEGCs, but also for other than UN MEGCs. They are general safety indications that should be applicable for all kinds of MEGCs. Therefore, Spain considers it necessary to include in Chapter 4.3 the requirements included in 4.2.4.5.

¹ A/78/6 (Sect. 20), table 20.5.
² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2024/2.
I. Proposal

4. The proposed amendment can be made alternatively by referencing 4.2.4.5 in Chapter 4.3 or by including the texts of 4.2.4.5 into the relevant provisions of Chapter 4.3.

   Alternative 1

5. Include a new 4.3.3.2.5 as follows:

   "4.3.3.2.5 The MEGCs shall be filled in accordance with 4.2.4.5."

   Alternative 2

6. Include a new 4.3.3.2.5 as follows (same text as in 4.2.4.5.1-4.2.4.5.3):

   "4.3.3.2.5 Prior to filling, the MEGC shall be inspected to ensure that it is authorized for the gas to be carried and that the applicable provisions of RID/ADR have been met. Elements of MEGCs shall be filled according to the working pressures, filling ratios and filling provisions specified in packing instruction P200 of 4.1.4.1 for the specific gas being filled into each element. In no case shall an MEGC or group of elements be filled as a unit in excess of the lowest working pressure of any given element. MEGCs shall not be filled above their maximum permissible gross mass."

II. Consequential amendments

7. Renumber current 4.3.3.2.5 as 4.3.3.2.6.

8. Amend 4.3.3.1.1, 6.8.2.4.1 and 6.8.3.4.2 as follows:

   "4.3.3.1.1 In the table, in row "2 Calculation pressure", in column "Tank Code", in the explanation of "x", replace "4.3.2.2.5" by "4.3.2.2.6".

   6.8.2.4.1 In the sentence after the table, replace "4.3.3.2.5" by "4.3.3.2.6".

   6.8.3.4.2 Replace "4.3.3.2.5" by "4.3.3.2.6".

III. Justification

9. The objective of this proposal is to add the necessary requirements for the filling of MEGCs in Chapter 4.3.

10. Ensuring a more systematic approach and a better rationale in RID/ADR helps to develop clearer legal texts and avoid different criteria among different Contracting Parties/Contracting States and inspection services, and thus helps to implement the United Nations Sustainable Development Goal number 16: Peace, justice and strong institutions.

11. The application of transport of dangerous goods regulations based on the Model Regulations, such as developed by the Joint Meeting ensures transport safety. Therefore companies, countries, workers and consumers can rely on a safe availability of the products they import, produce, handle, transport or use, contributing to maintaining their physical health and reducing environmental hazards throughout the life cycle of the products, contributing to the implementation of the UN Sustainable Development Goal number 3: Health and well-being.