RID: 44th Session of the Committee of Experts on the Transport of Dangerous Goods
(Zagreb, 19 - 23 November 2007)

Subject: Adaptation of RID Chapter 6.8 following the implementation of the TSI for Freight Wagons

Comments from the International Union of Private Wagons (UIP) on document OTIF/RID/CE/2007/13 (Belgium)

In principle, UIC supports the updating of experiences and requirements. As the UIC leaflet, which deals exclusively with tank-wagons, is not reflected in the TSIs that now apply, and as the TSIs only refer to RID, it would seem appropriate to include both the points proposed by Belgium.

However, it must be pointed out that not all tank-wagons currently in use meet the requirements of both these regulations, as the UIC leaflets act as standards and represent a forward-looking requirement, i.e. there was never any obligation to retrofit. Therefore, if this Belgian proposal is adopted, suitable transitional provisions must be considered.

With regard to the distance of 300 mm to the buffer beam, UIP feels it would be correct to use the general transitional provision:

“Tank-wagons constructed before 1 January 2009 which do not meet the new provisions concerning the distance between the tank and the buffer beam in accordance with … may still be used.”

With regard to the use of C buffers on gas tank-wagons (a requirement which has existed since around 1980), UIP believes there is no need for a rule in the current RID at all. For new wagons and partly for retrofitting, RID already contains provisions. Other existing wagons may continue to be used in accordance with their approval. Even if considerable modifications have to be made to such an existing wagon, thus requiring a new approval, it is UIP’s view that the requirements of the current RID concerning crash elements would automatically have to apply.