

OTIF



ORGANISATION INTERGOUVERNEMENTALE POUR  
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

ZWISCHENSTAATLICHE ORGANISATION FÜR DEN  
INTERNATIONALEN EISENBAHNVERKEHR

INTERGOVERNMENTAL ORGANISATION FOR INTER-  
NATIONAL CARRIAGE BY RAIL

INF.21

2 November 2009

(English only)

**RID:** 47<sup>th</sup> Session of the Committee of Experts on the Transport of Dangerous Goods  
(Sofia, 16 - 20 November 2009)

**Subject:** Packing instruction P 203

**Proposal transmitted by Belgium**

## Background

1. During its session in September 2009, the RID/ADR/ADN Joint Meeting discussed document ECE/TRANS/WP.15/AC.1/2009/16/Add.1 and decided to eliminate paragraph (8) of the adapted packing instruction P 203 for refrigerated liquefied gases:

*“(8) Periodic inspection*

*Receptacles [other than UN receptacles] shall be subjected to periodic inspections in accordance with the provisions of [6.2.1.6 and] 6.2.3.5 [6.2.3.5.2] respectively. Periodic inspections shall be carried out every 10 years.*

*By derogation from this date, the periodic inspection of receptacles which make use of composite materials (composite receptacles) may be carried out at intervals determined by the competent authority of the COTIF Member State/Contracting Party to RID/ADR which has approved the technical code for the design and construction.”*

2. The consequential amendments resulting from this decision were the elimination of 6.2.3.5.2

*“6.2.3.5.2 Closed cryogenic receptacles shall be subjected to periodic inspections and tests by a body authorised by the competent authority in accordance with the periodicity defined in packing instruction P 203 of 4.1.41 to verify external conditions, condition and operation of pressure relief devices and be subjected to a leakproofness test at*

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*90% of the maximum working pressure. The leakproofness test shall be carried out with the gas contained in the pressure receptacle or with an inert gas. Checking shall be performed by means of a pressure gauge or by vacuum measurement. The thermal insulation need not be removed."*

and of the last sentence of 4.1.6.10

*"[Closed cryogenic receptacles [, other than UN closed cryogenic receptacles,] shall be periodically inspected according to the provisions of 6.2.3.5.1 and P 203 (8).]"*.

3. This decision was taken after a rather complex discussion, resulting in some confusion amongst the delegates.
4. The elimination of the periodic inspections for cryogenic receptacles can result in an unacceptable reduction of the safety level for the carriage of refrigerated liquefied gases. Especially the fact that it will no longer be compulsory to verify the condition and operation of the pressure relief devices on a regular basis is worrying.
5. Belgium therefore would like WP.15 and RID Committee of Experts to reconsider the decision taken by the RID/ADR/ADN Joint Meeting.

### **Proposal**

6. Reinstate
    - Paragraph (8) of packing instruction P 203 (with the parts in square brackets included),
    - Paragraph 6.2.3.5.2,
    - The sentence "Closed cryogenic receptacles, other than UN closed cryogenic receptacles, shall be periodically inspected according to the provisions of 6.2.3.5.1 and P 203 (8)." in 4.1.6.10.
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