



INF. 9

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(Video-conference, 24 to 26 November 2020)

Subject: Comments on document OTIF/RID/CE/GTP/2020/12 from UIP

Transmitted by the International Union of Railways (UIC)

Introduction

1. In UIP's document OTIF/RID/CE/GTP/2020/12, a new footnote is proposed for RID 6.8.2.2.2 to clarify the requirements for the position and/or closing direction for dry break couplings. UIC welcomes this proposal for clarification, as there are no regulations to date, although dry break couplings are used in practice.
2. However, UIC is of the opinion that the second sentence of the new Note ("If not connected with a female part, these couplings are closed.") does not provide sufficient clarification, on the contrary, it again creates ambiguities.

Explanation

3. The term "**female part**" is neither mentioned in the requirement for construction or use, nor is it regulated in definitions.
4. Likewise, the text section "**or similar systems**" in the first sentence after "the mode of operation of dry break coupling systems" is not clearly defined and could lead to misinterpretations.
5. Especially from the point of view of the carrier, who has to check obvious defects or missing pieces of equipment in accordance with 1.4.2.2.1 (c), this new provision is difficult to implement in practice, since the "female coupling/mother part" is not attached to the tank, and is not therefore part of the equipment, so it is not known how it is constructed.
6. Dry break couplings can be used as a second or third closing device. This can be confused with the receiving part (female coupling), especially when used as a third closing device.

Conclusion

7. For UIC, it is therefore sufficient if the new footnote regulates exclusively for dry break couplings the self-closing mode of operation and the waiver of an open/closed indicator.

Proposal

8. Amend footnote *) at the end to read as follows:

"The mode of operation of dry break coupling systems is self-closing. Consequently, an open/closed indicator is not necessary."
