



INF. 13

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(English and German only)

RID: 4th Session of the RID Committee of Experts' standing working group
(Madrid, 17 - 20 November 2014)

Subject: Define a standard reference for checks in tank transport allowing all operators involved to meet RID obligations in a traceable manner

Comments from the European Chemical Industry Council (CEFIC) on document OTIF/RID/CE/GTP/2014/23

1. At the 3rd session of the RID Committee of Experts' standing working group (Bern, 20/21 May 2014) it was decided to postpone the discussion on the Italian document OTIF/RID/CE/GTP/2014/15 entitled "Define a standard reference for checks in tank transport allowing all operators involved to meet RID obligations in a traceable manner" to the next meeting in Madrid.
2. In the meantime, Italy has revised this document and a new, modified document OTIF/RID/CE/GTP/2014/23 entitled "Define a standard reference for checks in tank transport allowing all operators involved to meet RID obligations in a traceable manner – 2nd Proposal" has been submitted to the next meeting in Madrid. Unfortunately, as this document was submitted after the deadline for the submission of documents, there has been little time for CEFIC to coordinate its position.
3. One of the reference documents referred to is informal document INF.10 from the 51st session of the RID Committee of Experts. This informal document was drafted by CEFIC at the end of the meeting of the working group on the safety obligations of participants (Rome, 12/13 April 2012). The aim of this document was to set up checklists for fillers and unloaders with the aim of avoiding leakages during the transport of liquid dangerous goods caused as a result of errors in filling and unloading tank-wagons. These checklists were to be published on the OTIF website and integrated in RID as Note to 1.4.3.3 and 1.4.3.7.1.

For reasons of cost, only a limited number of copies of this document have been made. Delegates are asked to bring their own copies of documents to meetings. OTIF only has a small number of copies available.

4. In the framework of the decision-making process at that time, the fact that measures for the control of tank-wagons for gases already existed in RID 4.3.3.4 was taken into account. These measures describe the requirements to ensure the leaktightness of the shell, the items of equipment and the closing devices before, during and after filling. At that time, RID did not contain any such control measures for liquids.
5. In document OTIF/RID/CE/GTP/2014/23, Italy would like to extend the current requirement in 1.4.3.3 and 1.4.3.7.1 to tanks and tank-wagons for gases. The aim of adding the new 5.4.1.2.6 is to ensure that the name or identification code of the person responsible who carried out the checks according to 1.4.2.2.1 is included in the transport document in addition to the date of the check. From the Italian perspective these new proposals would ensure a higher safety level and would ensure that the entire process could be traced.
6. CEFIC supports reasonable measures which help to improve safety. However, with regard to this document, clarification is still necessary:
 - (a) Italy does not refer to the control measures in 4.3.3.4. What impact do the proposed checklists have on the sub-section?
 - (b) The increase in safety that Italy sees by including the name or identification code of the person responsible in the transport document, as well as the date of the check, in terms of the obligations in 1.4.2.2.1, needs further justification. In accordance with Chapter 1.4, other people are also involved in the process and these people would also have to be named, but they are not referred to in the proposal. It is also not clear whether "person responsible" means the filler/unloader, or whether it is still the carrier who is being referred to.
 - (c) Assuming that the name or identification code of the person responsible is shown in the transport document, the question arises as to whether Italy would then allow national control authorities to get into touch with these persons directly.
 - (d) In general, this raises the question of the appropriate cost/benefit ratio in relation to the safety gain referred to. Italy has not provided any information on this.
7. In particular, CEFIC believes this proposal on how to deal with carrying out the responsibilities according to 1.4.2.2.1, with subsequent recording in the transport documents according to 5.4.1.2.6, as an additional burden, without any gain in safety.
