

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, 21-25 March 2011

Item 5(b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Clarification of sub-section 1.1.4.2.1 regarding the import of cylinders approved by the United States Department of Transportation (DOT cylinders) in European ADR contracting parties

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

1. The expert from the Government of Belgium has transmitted ECE/TRANS/WP.15/AC.1/2011/6 concerning the import of cylinders approved by the United States Department of Transportation (DOT cylinders) in European ADR contracting parties.
2. ECE/TRANS/WP.15/AC.1/2011/6 details the background and analysis to the problem concerning the importation of cylinders approved by the United States Department of Transportation .
3. The European Industrial Gases Association fully supports this paper and wishes to see a resolution that removes the requirement for a multilateral agreement.

Background

4. Historically, gas cylinders were only transported a relatively short distance as production facilities were close to the end user, and the products involved did not require specialist production facilities. Due to the demands of technological change, such as the advances in electronics, which include semi conductors, cutting of materials using lasers, there has been a requirement for specialist class 2 products to meet these demands.
5. These specialist products of class 2 are high value and only manufactured in a relatively few locations globally, a number of these are in the United States. They are usually required to be filled into cylinders that

have undergone special internal surface treatment to ensure the product purity, and the cylinders usually remain in the same gas service for their entire life. The volume of products involved is not large, but they are critical to many manufacturing processes within the geographical area covered by the RID/ADR/ADN. Without these products many production facilities will not be able to function.

Proposals

6. EIGA supports the proposal of Belgium to find a permanent solution to the distribution of gases of class 2 in DOT cylinders after the expiry of M180 on 2nd June 2011, but requests that contracting parties agree to a new multilateral agreement to follow on immediately from M180 until a permanent solution can be implemented.

Justification

7. A permanent resolution of this will ensure a continuity of supply of products, and as has been demonstrated by the multilateral M180, there have not been any issues with either safety or enforcement.
