

## 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

Geneva, 21 September – 1 October 2021

20 September 2021

Item 5 (b) of the provisional agenda

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

### Amendment of RID/ADR 1.1.3.2(e)

#### Transmitted by the Government of the United Kingdom

1. In document ECE/TRANS/WP.15/AC.1/2021/39 the Government of Ireland has brought forward a proposal to exempt special equipment containing gases necessary for the operation of the equipment when carried as a load in RID/ADR. They demonstrate from the carriage of these items by air, over many years, that this is a safe practice.
2. The Government of the United Kingdom has examined the proposal, and appreciates the work put in by the Government of Ireland and is fully supportive of the aim of the proposal. However, we believe that there are significant issues with the proposal as written.
3. Firstly if the gases are contained in the equipment then the equipment should be classified and identified as UN 3538 Articles containing non-flammable, non-toxic gas n.o.s. However, the gases are not contained in the equipment but are allowed to escape to the atmosphere.
4. Secondly the gases are not necessary for the operation of the equipment. In this instance the primary purpose of the equipment is to contain the water in which the fish are placed. The addition of oxygen or air merely allows for either more fish to be transported at once or for an extended time period before the oxygen in the water is depleted.
5. Finally we do not feel that it is appropriate to include spare gas cylinders in any exemption as the limited load and empty cylinder provisions already provide sufficient relaxation from the regulations.
6. Therefore, we cannot support the proposal of the Government of Ireland but believe that the aim of the document can be achieved with the following proposal.

#### Proposal

7. Insert into RID/ADR a new 1.1.3.2 (i):
    - "(i) Articles or equipment connected to cylinders of gases of Groups A or O providing a regulated flow of gas during transport used for conditioning or preservation of life. The cylinders shall meet the requirements of Packing Instruction P200 and either be contained in or firmly attached to the article or equipment in which the gas is being used. (e.g. fish-tanks)."
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