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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, 25-28 March 2024 Item 5 (b) of the provisional agenda Proposals for amendments to RID/ADR/ADN: New proposals

Modification of the requirements for pressure receptacles authorised by the United States of America Department of Transportation

Transmitted by European Industrial Gases Association (EIGA)*,**

I. Introduction

1. 1.1.4.7 of RID/ADR/ADN allows the import and export of gases in pressure receptacles authorised by the United States of America Department of Transportation.

2. In the headings of 1.1.4.7.1 and 1.1.4.7.2 the word "gases" is used, implying that this is only applicable to pressure receptacles carrying substances of Class 2 and no other substances.

3. In packing instruction P200, there are also substances listed, which are not Class 2 (gases) but which can be carried in pressure receptacles, too.

4. EIGA believes that 1.1.4.7 should apply to all substances of all classes listed in the tables of P200.

II. Proposal

5. EIGA proposes two alternatives for a new wording as follows (new text is underlined, deleted text is stricken through).

Alternative 1

1.1.4.7.1 Import of gases pressure receptacles

^{**} Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2024/13.



^{*} A/78/6 (Sect.20), table 20.5.

1.1.4.7.2	Export of gases pressure receptacles and empty uncleaned pressure
	receptacles

Alternative 2

1.1.4.7.1	Import of gases substances listed in packing instruction P200
1.1.4.7.2	Export of gases substances listed in packing instruction P200 and empty
	uncleaned pressure receptacles

III. Justification

6. The proposed changes have no safety implications, i.e. LC50 values of the non-Class 2 substances in packing instruction P200 are not lower than various substances of Class 2.

7. The changes proposed will also allow the import and export in "DOT pressure receptacles" carrying other substances listed in P200 which are not classified under Class 2, e.g. UN 1052 HYDROGEN FLUORIDE, ANHYDROUS, which is critical to European industry but not readily available on the European market in the required quality.