

**Working Party on the transport of dangerous goods**

**Joint Meeting of the RID Safety Committee  
and the Working Party on the Transport of  
Dangerous Goods**

(Geneva, 1-10 September 2003)

**PROVISIONS CONCERNING CARRIAGE IN BULK**

**Comments by the Government of Belgium to documents TRANS/WP.15/AC.1/2003/56/Add.6,  
TRANS/WP.15/AC.1/2003/56/Add.7 and INF 6.**

**1. Introduction**

In documents TRANS/WP.15/AC.1/2003/56/Add.6 and Add 7, the Ad hoc Working Group on the Harmonisation of RID/ADR/ADN with the UN Recommendations on the Transport of Dangerous Goods proposes to introduce a new chapter 6.11 and to amend chapter 7.3. These chapters would retain the provisions concerning carriage in bulk as they exist now in ADR and RID, and add *in extenso* the new provisions of the model regulations concerning the transport in bulk containers. This proposal has given rise in Belgium to the following remarks :

- in Belgium, there have never been any incidents or accidents that would indicate that the ADR/RID-provisions concerning carriage in bulk are insufficient from the safety point of view ; moreover, the Belgian competent authority has no knowledge of any of such incidents or accidents having occurred in other Contracting Parties or Member states. The proposal of the United Kingdom, contained in INF. 6 is therefore completely unacceptable on the basis of a very elementary cost/benefit analysis : when no sea or air transports are involved (the vast majority of bulk transports, perhaps not in the UK but most certainly in the whole of Europe) there would be a very substantial increase of costs (linked to the approval, inspection and testing of bulk containers and vehicles) without any significant improvement of safety during transport.
- Belgium agrees that transport in bulk containers according to the new chapters 4.3 and 6.8 of the UN Model Regulations must be made possible to accommodate for multimodal transports. There is, however, no necessity whatsoever to reproduce the text of these chapters in full in ADR and RID. References to other publications (e.g. standards) have become common practice in our regulations and Belgium can see no reason why in this case a reference to the IMDG-Code and the ICAO Technical Instructions would not be acceptable. It is not difficult to use the approved bulk containers in the framework of the now-existing VV or VW special provisions of ADR/RID, and the participants who will be obliged to use approved bulk containers (because their transport is multimodal) have to be acquainted with the IMDG-Code or the ICAO Technical Instructions for many other reasons.

## 2. Proposals

- 2.1. Belgium proposes not to introduce the new chapter 6.11, put forward in document TRANS/WP.15/AC.1/2003/56/Add.6.
- 2.2. Amend Chapter 7.3 to read as follows :

### “CHAPTER 7.3

#### PROVISIONS CONCERNING CARRIAGE IN BULK

- 7.3.1 Goods may not be carried in bulk in vehicles or containers unless the conditions put forward in 7.3.2 or in 7.3.3 are satisfied.
- 7.3.2.1 A special provision, identified by the code VV/VW, explicitly authorizing this mode of carriage is indicated in column (17) of Table A of Chapter 3.2 for these goods and the conditions of this special provision are satisfied.  
  
Nevertheless, empty packagings, uncleaned may be carried in bulk if this mode of carriage is not explicitly prohibited by other provisions of ADR/RID.

*NOTES : For carriage in tanks, see Chapters 4.2 and 4.3.*

- 7.3.2 becomes 7.3.2.2  
7.3.3 becomes 7.3.2.3

- 7.3.3 The bulk transport satisfies the applicable conditions put forward in [Chapter 4.3 and 6.8 of the IMDG-Code or of the ICAO Technical Instructions].

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