PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

Comments of Belgium on document INF.16

In INF.16, the European Commission proposes transitory measures for certain adopted ADR/RID/ADN amendments (1.8.6, 1.8.7, 6.2.2.9, 6.2.3.6, TA4 and TT9), because they might cause conflicts with the EU Directive 99/36/EC on transportable pressure equipment (TPED).

It should, however, not be forgotten that these amendments came from the TPED-Directive itself and that for the accreditation provisions or application of conformity assessment modules/procedures concerning class 2, the RID/ADR/ADN version of 2007 differs much more from TPED than the 2009 version does. In fact, the differences between the RID/ADR/ADN version of 2009 and TPED – if any – will be insignificant.

For this reason, Belgium is of the opinion that the introduction of the transitory measures would be counterproductive.