

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

10 August 2010

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

Geneva, 13–17 September 2010

Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN

Periodic inspections and tests of IBCs

Application of 6.5.1.1.3

Transmitted by the Government of Belgium

It has come to the knowledge of the Belgian competent authority that in several [Contracting Parties to ADR/RID Member States], IBCs are being periodically inspected and tested without distinction, irrespective of what country they have been approved in.

This procedure is in contradiction with 6.5.1.1.3 : *“The construction, equipment, testing, marking and operation of IBCs shall be subject to acceptance by the competent authority of the country in which the IBCs are approved.”*

Paragraph 6.5.1.1.3 – being part of section 6.5.1 “General requirements” – is valid for all of chapter 6.5 and therefore also for 6.5.4.4 where the leakproofness tests every two and a half years are dealt with (it should also be noted that sub-section 4.1.2.2 cannot be used to derogate from 6.5.1.1.3, because of the reference “in accordance with 6.5.4.4” made in 4.1.2.2).

Belgium is aware of the practical difficulties emerging from the strict application of 6.5.1.1.3, but sees no legal possibility not to do so. It would like to have the opinion of the Joint Meeting on possible solutions for this problem (taking into account that 6.5.1.1.3 is taken over as such from the UN Model Regulations).
