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**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**

Bern, 18–22 March 2019

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:  
new proposals****Use of packagings, including intermediate bulk containers  
(IBCs) and large packagings****Transmitted by the Government of Spain<sup>\*</sup>, <sup>\*\*</sup>***Summary*

|                            |                                                                         |
|----------------------------|-------------------------------------------------------------------------|
| <b>Executive summary:</b>  | Analyse the cross reference included into paragraph 4.1.1.3 in RID/ADR. |
| <b>Action to be taken:</b> | Delete the last sentence of 4.1.1.3 of RID/ADR.                         |

**Introduction**

1. The representative from Spain has been informed by the Spanish industry about a possible incoherence or misunderstanding related to the last sentence included in 4.1.1.3 of RID/ADR, where a reference to 6.1.1.3 is made.

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\* In accordance with the programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/WP.15/237, annexe V, (9.2)).

\*\* Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2019/15.

## Analysis

2. In paragraph 4.1.1.3 of RID/ADR the following text is included:

“Unless otherwise provided elsewhere in RID/ADR, each packaging, including IBCs and large packagings, except inner packagings, shall conform to a design type successfully tested in accordance with the requirements of 6.1.5, 6.3.5, 6.5.6 or 6.6.5, as applicable. The packagings for which the test is not required are mentioned under 6.1.1.3.”

3. The last sentence of 4.1.1.3: “*The packagings for which the test is not required are mentioned under 6.1.1.3*”, can be confusing because it could be understood that “the test” to which this sentence refers to, are those mentioned in the first sentence of paragraph 4.1.1.3 (design type test). However, paragraph 6.1.1.3 of RID/ADR refers to the leakproofness test, which is part of a quality assurance program, as can be see below:

“6.1.1.3 Every packaging intended to contain liquids shall successfully undergo a suitable leakproofness test. This test is part of a quality assurance program as stipulated in 6.1.1.4 which shows the capability of meeting the appropriate test level indicated in 6.1.5.4.3:

- (a) Before it is first used for carriage;
- (b) After remanufacturing or reconditioning, before it is re-used for carriage.

For this test, packagings need not have their own closures fitted.

The inner receptacle of composite packagings may be tested without the outer packaging provided the test results are not affected.

This test is not necessary for:

- Inner packagings of combination packagings.
- Inner receptacles of composite packagings (glass, porcelain or stoneware), marked with the symbol “RID/ADR” according to 6.1.3.1(a)(ii).
- Light gauge metal packagings, marked with the symbol “RID/ADR” according to 6.1.3.1(a)(ii).”

4. Paragraph 6.1.1.3 of RID/ADR does not refer to the equipment that does not have to be subject to the design type test, but to the leakproofness test, which is independent of the tests for the design type. The last sentence of 4.1.1.3 as written now is confusing, as it does provide a cross reference to a non-related information.

## Justification

5. This last sentence of 4.1.1.3 is part of RID/ADR since before 2001, and has not been modified; perhaps, it made reference previously to a paragraph with a different content.

6. Additionally, in other regulations as the UN Model Regulations or the IMDG Code, this last sentence of 4.1.1.3 is not included.

## Proposal

7. Spain would suggest deleting the last sentence included in paragraph 4.1.1.3 of RID/ADR to avoid further confusion and to harmonize with the paragraph included into the Model Regulations (deleted text ~~stricken through~~):

4.1.1.3 “Unless otherwise provided elsewhere in ADR, each packaging, including IBs and large packagings, except inner packagings, shall conform to a design type successfully tested in accordance with the requirements of 6.1.5, 6.3.5, 6.5.6 or 6.6.5, as applicable. ~~The packagings for which the test is not required are mentioned under 6.1.1.3~~”.

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