



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**

Geneva, 19-29 September 2023

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
new proposals****Testing of packaging or IBC fitted with a venting device****Transmitted by the Government of the Netherlands* ******Introduction**

1. In the Netherlands a recognized packing institute has indicated that there might be a gap between the use of a packaging or an IBC fitted with a venting device as stated in 4.1.1.8, and the testing of packaging or IBC fitted with a venting device as stated in 6.1.5.2.5 or 6.1.5.2.6.
2. The second sentence of the second paragraph in 4.1.1.8 states that the vent shall be so designed that, when the packaging or IBC is in the attitude in which it is intended to be carried, leakages of liquid and the penetration of foreign substances are prevented under normal conditions of carriage. This might be interpreted that the venting device should function properly during normal transport without any testing obligations, because no reference is made in 4.1.1.8 to testing of the packaging or IBC fitted with a venting device.
3. For packaging fitted with a vent, testing requirements are given in 6.1.5.2.5 (second paragraph) or 6.1.5.2.6 (third paragraph). A storage test is required, and the tests prescribed in 6.1.5.3 to 6.1.5.6.
4. The understanding of the Netherlands is that a packaging or an IBC fitted with a vent shall undergo the tests mentioned in 6.1.5.2.5 or 6.1.5.2.6, but a reference to these tests is missing in 4.1.1.8.
5. In the view of the Netherlands, there seems to be a gap between the provisions in 4.1.1.8 and the provisions in 6.1.5.2.5 or 6.1.5.2.6, because when only reading 4.1.1.8 it is possible that the user only relies on the requirement in 4.1.1.8 and does not perform the required additional tests as mentioned in 6.1.5. To solve this gap and to prevent misunderstanding it is proposed to clarify and amend provision 4.1.1.8 in RID/ADR.

* A/77/6 (Sect.20), para. 20.76.

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Proposal

6. In 4.1.1.8, at the end of the second paragraph, add a new sentence to read:

"Packagings or IBCs fitted with a vent shall be capable of passing the tests prescribed in 6.1.5.2.5 or 6.1.5.2.6, as applicable."

Justification

7. The aim of this document is to solve a gap between the use of a packaging or an IBC fitted with a vent in 4.1.1.8 and the testing requirement of the packaging or IBC which are fitted with a venting device as mentioned in 6.1.5 and to prevent unsafe situations during the transport of dangerous goods in such packaging and IBC.

8. The proposed amendment in 4.1.1.8 of RID/ADR does not conflict nor creates any disharmonisation with the UN Model Regulations, because 6.1.5.2.5 and 6.1.5.2.6 do not exist in the Model Regulations.

9. Ensuring a more systematic approach and a better rationale in RID/ADR helps to develop clearer legal texts and avoid different criteria among different Contracting Parties/States and inspection services, and thus helps to implement the United Nations Sustainable Development Goal number 16: Peace, justice and strong institutions.
