



UNECE - TIRExB - Geneve – February, 2010.

**TIR APPROVAL OF A
SPECIFIC CONSTRUCTION
OF ROAD VEHICLES**

(EMPTY SPACES AS A PART OF THE LOAD COMPARTMENT)

ANNEX 2, Article 1:**Basic principles**

Approval for the international transport of goods under Customs seal may be granted only to vehicles, the load compartments of which are constructed and equipped in such a manner that:

- a) no goods can be removed from or introduced into, the sealed part of the vehicle without leaving obvious traces of tampering or without breaking the Customs seal;**
- b) Customs seals can be simply and effectively affixed to them;**
- c) they contain no concealed spaces where goods may be hidden;**
- d) all spaces capable of holding goods are readily accessible for Customs inspection.**

ANNEX 2, Article 2, paragraph 2:

2. Notwithstanding the provisions of Article 1 (c) of these Regulations, constituent parts of the load compartment which, for **practical reasons**, have to include empty spaces (for example, between the partitions of a double wall) shall be permitted.

In order that the said spaces cannot be used to conceal goods:

(i) where it covers the **full height from floor to roof**, or, in **other cases**, where the space between it and the outer wall is completely enclosed, the lining inside the load compartment shall be so fitted that **it cannot be removed and replaced without leaving obvious traces**; and

ANNEX 2, Article 2, paragraph 2:

- (ii) where a lining is of less than full height and the spaces between the lining and the outer wall are not completely enclosed, and **in all other cases where spaces occur** in the construction of a load compartment, the **number** of such spaces shall be **kept to a minimum** and these spaces

shall be readily accessible for Customs inspection.

Special construction of the load compartment floor:

A built in "trapez" shaped trough placed at the center of the vehicle, providing a solid base for transport of items with a cylindrical shape, e.g. sheet metal coils, large dimension metal- or concrete pipes. The trough can be covered – partly or fully - by a number of loose floorboards with a specific built-in reinforcement construction.

3 possible options for loading of goods:

- A** – The trough can be left open in its entire length, or the trough only being covered where the loaded goods or items (e.g. coils or pipes) is placed. **No floorboards covering any part of the trough.**
- B** – The trough is covered by the goods itself. The remaining part of the trough can be partly or fully covered with loose floorboards; **NO goods loaded and placed on top of any of the floorboards.**
- C** – The trough can be partly or fully covered with loose floor boards, **with goods loaded and placed on top of any of the floorboards.**

Loading option A:

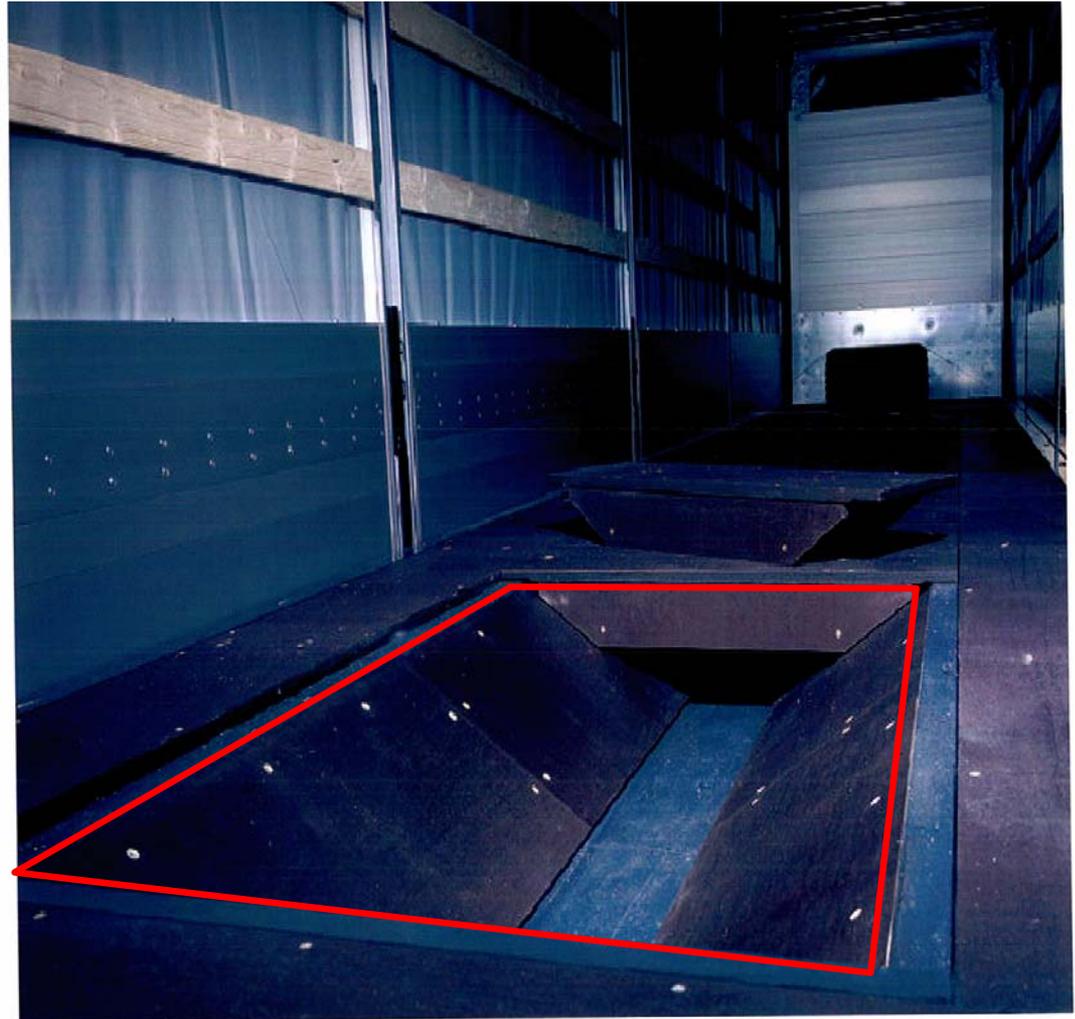
The trough is left open in its entire length, NO floorboards being present inside the load compartment!

(as shown within the framed area)

There are **NO empty spaces** which can be used to conceal goods.

TIR Approval: ✓

(Highly inappropriate platform for EUR-pallets or goods in boxes!)



Loading option B:

The trough is covered by the goods itself, i.e. a sheet metal coil.

All floorboards left loose;
without goods placed on top:

There are empty spaces – but each individual floorboard can easily be lifted for inspection underneath as well as the trough itself.

Spaces are readily accessible for Customs inspection.

TIR Approval:



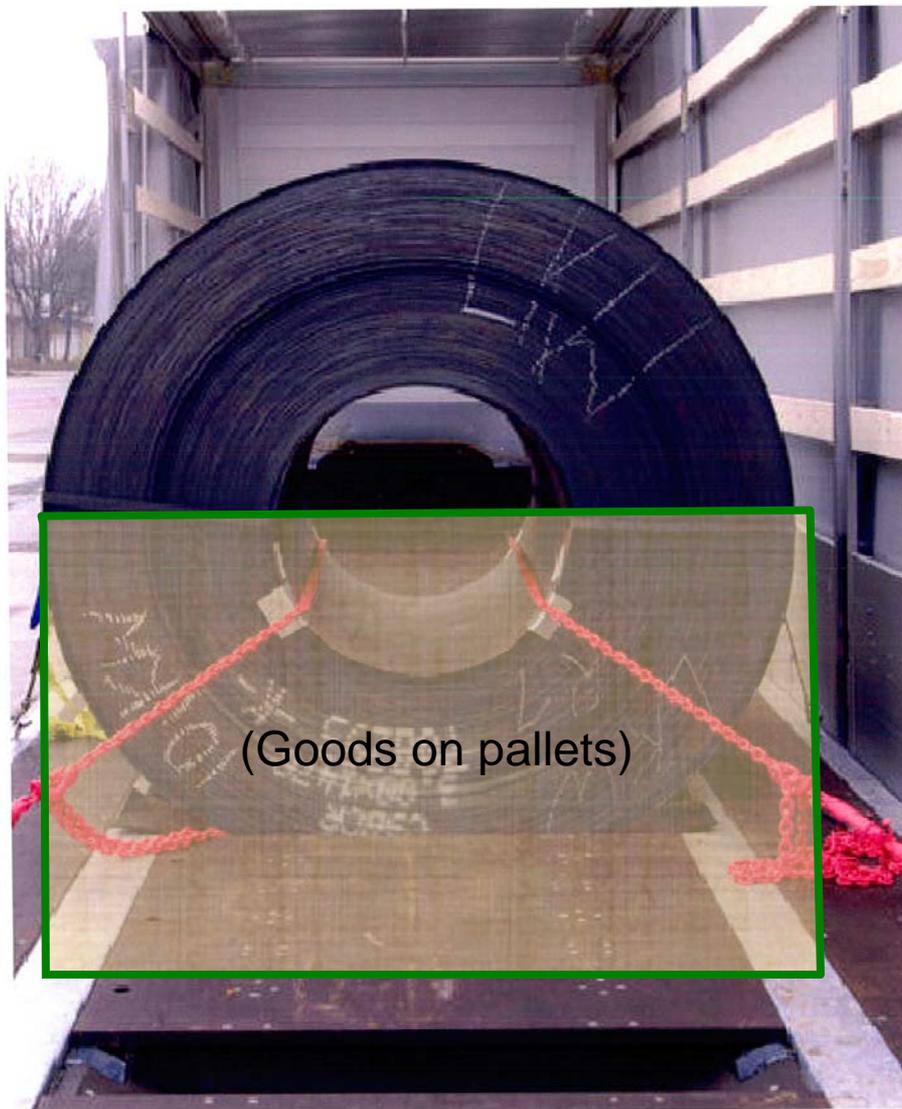
Loading option C:

The trough is covered by heavy goods where it is placed. Additional goods placed on top of one floorboard - or across several floorboards:

There are empty spaces – each individual floorboard **CANNOT** be inspected underneath, neither can the trough.

Spaces are **NOT** readily accessible for Customs inspection.

TIR Approval:





Due to the reinforcement construction, each individual floorboard holds
3 empty spaces underneath!

NOTE: Numbers shall be kept to a minimum!

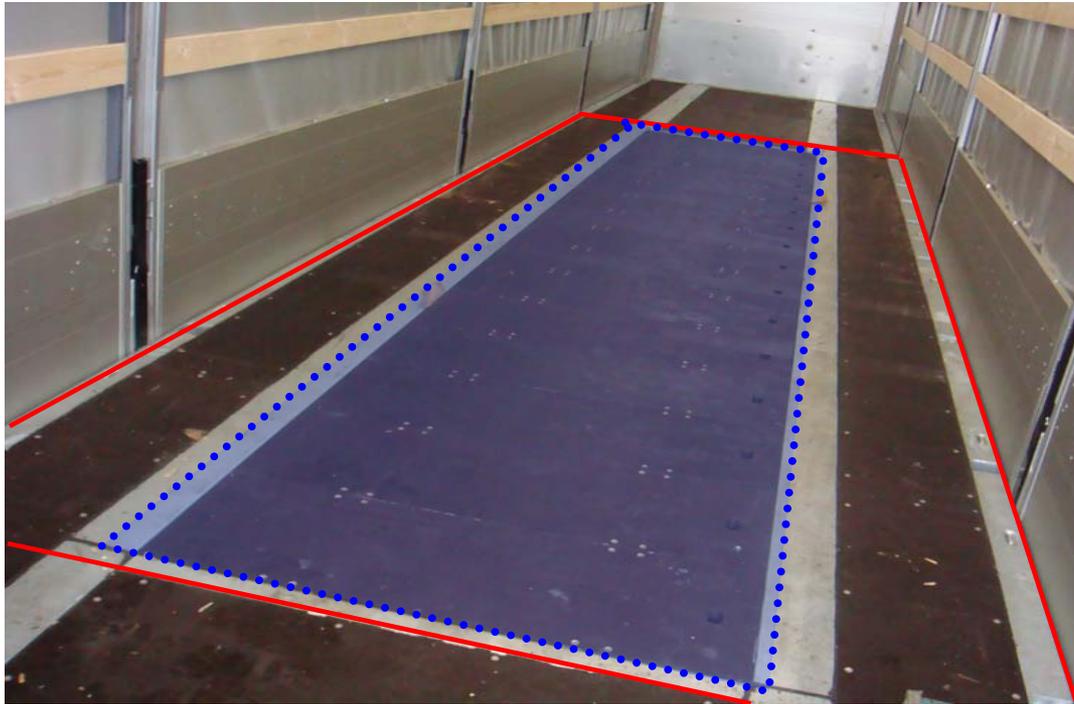
Annex 2, Article 2, paragraph 2, subparagraph (ii)



If a single floorboard is removed, front or rear of the load compartment, only the entire length of the very bottom of the trough can be inspected by simple means, e.g. visually by illumination using a torch. The area marked light yellow on the picture.

In order to fully inspect the “reinforcement construction” and the trough;

each individual floorboard must be lifted.



The area inside the dotted blue line ***MUST*** be free from goods in order to lift each individual floorboard for inspection underneath. Most likely all goods placed inside the area marked with a full red line must be offloaded, providing access to the loose floorboards and the trough.

Such demand for offloading at office of departure is fully acceptable with reference to chapter 1.2.4 of the TIR Convention; International recognition of Customs control measures.

At the end of the day a decision must be made by the relevant authorities, related to the following issue:

Does the TIR Convention provide a legal base for TIR Approval of load compartments designed and constructed for transport of only goods or items with a very specific shape, weight or dimension?

or:

Is the load compartment considered to be inspected for approval as “one unit” which must fulfill the technical standards as outlined in Annex 2 of the Convention, no matter what goods is (or can be) loaded?

I think the latter is the case!

Therefore this vehicle CANNOT be approved.

If a load compartment can be inspected and approved transport of only goods or items with a very specific shape, weight or dimension, a natural question will be: **WHAT COMES NEXT?**

I will just mention one example:

A load compartment floor with cylindrical holes for better storage and a more safe and secure transport of oxygen or gas cylinders. Loose covers for the holes when the vehicle is not transporting oxygen/gas cylinders!

My final conclusion – all options and regulations taken into consideration, including Customs related formalities at place of departure and at final destination:

The vehicle CANNOT obtain TIR Approval!

I strongly recommend that for transport of large cylindrical items, i.e. sheet metal coils, the option given for transport of HEAVY or BULKY goods should apply, according to the TIR Convention (Article 29; goods defined in Article 1, subparagraph (p)).

For this procedure the vehicle do not need TIR Approval.