

Working Party on the transport of dangerous goods

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

(Geneva, 13-17 September 2004)

Chapter 6.2

Comments by the Government of Belgium to proposal TRANS/WP.15/AC.1/2004/21

**1. Introduction**

In document TRANS/WP.15/AC.1/2004/21, EIGA proposes to restructure Chapter 6.2, in order to align it more with the 13th revision of the UN Model Regulations. By doing so, the future incorporation of the developments at the UN should be made easier.

Belgium is of the opinion that the text, as proposed by EIGA, does not achieve this goal in the best possible way. Moreover, it contains several errors, some of which could result in serious problems for the intermodal and intercontinental use of pressure receptacles bearing the UN mark.

**2. Objection in principle to the structure of the proposed chapter 6.2**

EIGA has followed in their sections 6.2.1 and 6.2.2 the structure and numbering of the UN Model Regulations, but the text itself is a combination of the UN provisions (in normal print) and text of RID/ADR concerning the general requirements for the other pressure receptacles (underlined). This way forward is different from what has been done for the portable tanks ; there the UN-text has been introduced without changes or additions, in chapters that are completely separate from the ones dealing with the other tanks.

There is no imperative reason why we would have to act in a different way when pressure receptacles are concerned. It could be argued that this “apartheid” would lead to many duplications of text, but that can easily be avoided, as is shown in the Belgian proposal below. The advantage on the other hand is clear : it is easier to maintain harmonisation between two texts when they always have to stay completely identical.

**3. Practical difficulties**

The UN provisions and the general provisions of RID/ADR are texts with different fields of application. Combining them has led to several errors :

- Footnote 1 (*If the country of approval is not a contracting party to ADR, the competent authority of a contracting party to ADR*) applies in 6.2.1.5.1 and 6.2.1.7.2 also to the pressure receptacles bearing the UN mark. This of course is fully unacceptable : the UN-receptacles constructed outside of Europe would be banned from all RID/ADR contracting parties.

- paragraph 6.2.1.4.3 cannot be made applicable to pressure receptacles bearing the UN mark, as it is the case in the proposal (according to its remark, and in spite of its proposal, EIGA seems to agree with this point of view).
- Note 2 of 6.2.2 cannot be made applicable to pressure receptacles bearing the UN mark, especially to those constructed outside of Europe.
- the underlined texts in 6.2.1 and 6.2.2 (with the exception of 6.2.1.6) also apply to the pressure receptacles bearing the UN mark. However, there are no corresponding provisions in chapter 6.2 of the UN Model Regulations. No doubt many of them will be found in the applicable ISO standards, but Belgium is not convinced that this is always the case, nor that they completely overlap each other every time.

#### 4. Proposal for another structure of chapter 6.2

Belgium proposes the following structure for chapter 6.2 :

##### **REQUIREMENTS FOR THE CONSTRUCTION AND TESTING OF PRESSURE RECEPTACLES BEARING THE UN MARK**

6.2.1 *[Contains section 6.2.1 of the UN Model Regulations]*

6.2.2 *[Contains section 6.2.2 of the UN Model Regulations]*

##### **REQUIREMENTS FOR THE CONSTRUCTION AND TESTING OF PRESSURE RECEPTACLES NOT BEARING THE UN MARK**

#### 6.2.3 **General requirements**

*[Contains a reference to section 6.2.1 and adds the additional general requirement, being the underlined texts in section 6.2.1 of the proposal]*

#### 6.2.4 **Pressure receptacles not bearing the UN mark designed, constructed and tested according to standards**

*[Contains a reference to section 6.2.2 and adds the list of all references that are not ISO standards]*

#### 6.2.5 **Pressure receptacles not designed, constructed and tested according to standards**

*[Contains section 6.2.3 of RID/ADR]*

#### 4. Other discrepancies

Proposal TRANS/WP.15/AC.1/2004/21 of EIGA contains some other discrepancies :

- There are numerous small editorial differences between the French text of the proposal and the corresponding French text of the UN Model Regulations. This should be remedied.
- The last paragraph of 6.2.1.1.3 (“Any additional thickness ...”) has to be eliminated. It does no longer exist in the 2005 version of RID/ADR.
- In its comment, EIGA suggests that the underlined text of 6.2.1.2.2 is no longer needed now that a substantial body of standards is available. This is of course not true for the pressure receptacles not designed and constructed according to standards. One could transfer these requirements to 6.2.3, but even that is not necessary : all general requirements of 6.2.1 are covered by standards listed in 6.2.2 without them being transferred to 6.2.3.

- It is not clear why the text “recognised by the competent authority” has been eliminated in 6.2.1.3.6.5.4. It exists in the UN Model Regulations and in the 2005 version of ADR.
  - In section 6.2.2, it is stated that the UN pressure receptacles shall comply with the ISO standards. This requirement is repeated in the sub-sections 6.2.2.1.1, 6.2.2.1.2, 6.2.2.1.3 and 6.2.2.4, but not in 6.2.2.3. This is very confusing and should be remedied (eliminate the requirement in all sub-sections, because it is not necessary to repeat it there, or add it in 6.2.2.3).
  - The French version of 6.2.2.7.1 does not correspond with the English one (“marques ci-dessous” and “preceding marks”). The French text is to be corrected to “marques ci-dessus”. The same correction is needed in the UN Model Regulations (ADR is already correct).
  - The French heading of 6.2.3 is wrong and should be brought in line with the English version (“conformément à des normes” instead of “conformément aux prescriptions ONU”).
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