

 <p>Federale Overheidsdienst Mobiliteit en Vervoer</p>		<p>DG Scheepvaart – Veiligheid en Milieuvrijwaring Natiokaai 5 8400 Oostende Uw contactpersoon : ing.P. Van Lancker, attaché Tel. : 059/561462 - Fax : 059/561474 Gsm : 0477/424204 e-mail : patrick.vanlancker@mobilit.fgov.be</p>
<p>Declaration GGV 2016-05-00</p>		

Interpretation of the Belgian Competent Authority

The FPS Mobility and Transport, DG Shipping received a lot off question whether according to 7.3.15 all explosives need to be transported in closed cargo transport units and that semi-trailers using a tarpaulin (non-rigid wall) may no longer be used.

The requirement in paragraph 7.3.3.15 “If goods of class 1 are packed, the cargo transport unit shall comply with the definition in 7.1.2 for closed cargo transport unit for class 1.” leaves room for interpretation. Reading it on its own, it could indicate that explosives when transported in a cargo transport unit, the unit should always comply with a closed cargo transport unit.

The Belgian competent authority is in the opinion that 7.3.3.15 shall be read in conjunction with the stowage categories for class 1 in 7.1.3.1. If in a stowage category the use of closed cargo transport unit is required, the CTU shall comply with 7.3.3.15 and a closed cargo transport unit shall be used. If ordinary stowage is permitted, 7.3.3.15 is not applicable and if wanted, any transport unit may be used.

Two examples:

UN 0012 has stowage category 01:

- Cargo and passenger ships on deck: closed CTU
- Cargo and passenger ships under deck: no requirement, trailer with non-rigid fences (tarpaulin) may be used

UN 0066 has stowage category 02:

- Cargo and passenger vessels on deck: closed CTU
- Cargo ships under deck: no requirement, trailer with non-rigid fences (tarpaulin) may be used
- Passenger ships under deck: closed cargo transport unit

Perhaps it is still not widely known, but certain 1.4s explosives may transported under ‘Limited Quantities’ (3.4 of the IMDG code).

This declaration can be changed or withdrawn by this administration at any time it considers necessary to do so. In any case this declaration will expire on the 31st of December 2017.



Gavere-Asper, 06/06/2016

Ing. Patrick Van Lancker, attaché