PROPOSAL FOR AMENDMENTS REGARDING PARTICULARS IN THE TRANSPORT DOCUMENT

The deletion of the abbreviations “ADR and “RID”

Submitted by the International Federation of Freight Forwarders Associations (FIATA) */

Executive summary: In order to harmonize with other modes of transport as well as simplify the information to be entered in the transport document it is proposed to leave out the letters “ADR” and “RID” from the transport document.

Action to be taken: Amendment to paragraphs 5.4.1.1.1, 5.4.1.1.3 and 5.4.1.1.6

Related document: Restructured RID/ADR; TRANS/WP.15/159/Add.4

Justification

Transport of dangerous goods by sea and air is carried out all over the world without it being felt necessary to specify the actual mode of transport in the transport document. It is only in the ADR and RID that a reference to the mode of transport is deemed necessary in the

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transport document. When dangerous goods are carried in an aircraft or on a ship there is no
doubt as to which mode of transport the dangerous goods consignment belongs to. Of course
the same reasoning can be applied for road and rail transport. Enforcement and emergency
services personnel have no doubt which mode of transport they face when acting in
accordance with their responsibilities. The requirement in question is only making it more
complicated for the users. Furthermore, in the light of harmonizing regulations in order to
facilitate multimodal transport operations, the requirement effectively prevents this.

The requirement does not add anything to safety while deleting the requirement would
not affect safety negatively. Moreover, it goes without saying that if the items for users to add
to the transport document are based on safety arguments, users will respect the regulations and
thus show more willingness to comply with them. Therefore, it is recommended to leave out
unnecessary information in the transport document.

Proposal

The paragraphs mentioned below are assumed to be the same for ADR and RID.

In paragraph 5.4.1.1.1

(1) Delete sub-paragraph (e)

(2) Delete “ADR” and “RID” in sub-paragraph (j).

(3) Renumber paragraph (f) – (j) to be (e) – (i).

In paragraph 5.4.1.1.3

Delete “ADR” and “RID” from the examples in the paragraph.

In paragraph 5.4.1.1.6

Delete “ADR” and “RID” from the two examples in the paragraph.