



Distr.
GENERAL

TRANS/WP.15/2004/5
29 October 2003

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport
of Dangerous Goods

(Seventy-fifth session, agenda item 5 (b),
Geneva, 19 -23 January 2004)

PROPOSAL FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Approval and placarding of transport units carrying goods of Class 1, Division 1.4S

Transmitted by the Government of Denmark

SUMMARY

Executive summary:	A transport unit may be carrying a mixed load of goods with the classification code 1.4S (Class 1) and dangerous goods of other classes in amounts exceeding the limits as set out in 1.1.3.6. From a formal point of view this means that the vehicle needs to be EX-approved, since the transport is no longer exempted from Part 9. Likewise, the placarding of the vehicle is affected. It is proposed to amend the text so that it will become clear that the vehicles carrying 1.4S need not be approved and placarded.
Action to be taken:	Amendments of 5.3.1.5.1 and 9.1.1.2.
Related documents:	None.

Introduction

It is commonly recognized that substances and articles of Class 1, Division 1.4S constitute a low risk compared to other dangerous goods of Class 1. Therefore, for a long time it has been possible to carry these substances and articles in unlimited amounts in accordance with 1.1.3.6 (former marginal 10 011). Among other things, this implied that the vehicles used need not be approved according to Part 9 (marginal 11 282). However, it is possible to carry dangerous goods of other classes together with substances and articles of Class 1, Division 1.4S. It may very well happen that these “other goods” cause the exceeding of the limits as set out in 1.1.3.6 and hence the exemption from Part 9 is no longer valid. An example:

50 kg of UN 0012 CARTRIDGES, SMALL ARMS (classification code 1.4S) is carried together with 600 litres of UN 1866 RESIN SOLUTION (Class 3, PG II). The calculated value is 1,800 (0 + 600 × 3) whereby the Class 3 product causes the exceeding of the limit of 1,000.

Before the 1999 amendments this did not constitute a problem, since the carrier could always choose to use a type I vehicle, which was not covered by marginal 11 282. Since a type I vehicle does not exist as a concept any more, the carrier has no other alternative than to use an EX/II approved vehicle. It seems that the only reason for this is that marginal 11 282 was not consequentially amended when the type I vehicle concept was abolished.

As regards the requirements for placarding of vehicles carrying goods of Class 1, the inconsistency has been there since before the entering into force of ADR1999. However, it does not seem reasonable to affix Class 1 placards to a vehicle carrying a mixed load including goods of 1.4S, when a full load of goods of 1.4S does not need placarding. In para 5.3.1.1.2 (a) of the UN Model Regulations, the placarding of transport units carrying any amount of 1.4S and excepted packages of radioactive material has been exempted, but only the last mentioned seems to have been addressed in the ADR (see para 5.3.1.5.2).

It may be argued that it is only a question of proper interpretation. However, a number of carriers have already faced problems with enforcement authorities.

Proposal

Amend the text in 5.3.1.5.1 to read:

“For vehicles carrying packages containing substances or articles of Class 1 (with a classification code other than 1.4S), placards shall be affixed to both sides and at the rear of the vehicle.”

In 9.1.1.2 amend the definition of “EX/II vehicle” or “EX/III vehicle” to read:

“EX/II vehicle or EX/III vehicle: means a vehicle intended for the carriage of explosive substances and articles (Class 1) with a classification code other than 1.4S.”

Justification

Safety: The proposal is of an editorial nature, so there should be no safety implications.

Feasibility: The proposal has no negative effect on costs.

Enforceability: The text will become clearer and therefore enforceability is improved.
