INF.28

ECONOMIC COMMISSION FOR EUROPE INLAND TRANSPORT COMMITTEE Working Party on the Transport of Dangerous Goods (Seventy-seventh session, Geneva, 25-28 October 2004, agenda item 4 a))

"DELIVERY-SALE" TRANSPORT

Transmitted by the European Liquefied Petroleum Gas Association (AEGPL)

1. Background:

AEGPL wish to make some comments on the Spanish proposal for delivery sales to multiple consignees who are not always known at the time the vehicle begins its journey" (Reference: TRANS/WP.15/2004/28)

2. Justification:

1) As written, the Spanish proposal does not completely reflect the description of "delivery sales" as given in the introduction: "transport of particular products that are delivered to multiple consignees who are not always known at the time the vehicle begins its journey".

This point needs to be clarified in the proposal by a better definition of "delivery sale" in 1.2.1. This may cause confusion with "ordered" or "regularly scheduled" deliveries to customers or resellers who "buy" (it's also a "sale") the product. In this case, the transport document can be clearly established with the names and addresses of the consignor and the consignee(s) and no additional monitoring system will be required, as it is the common practice in many LPG business in accordance with 5.4.1.4.1.

2) Marketing organizations may schedule "delivery sales" between **two or more** of their identified loading/unloading points and we do not see the absolute need for the vehicle to return to its original loading point.

AEGPL proposes to modify § 1 of the original proposal as follows:

3. Proposal of amendment of TRANS/WP.15/2004/28:

(changes are shown in bold)

1. Add the following definition in 1.2.1:

"Delivery sale" means a type of transport the purpose of which is to deliver goods of all classes except classes 1, 5 (Division 5.2) and 7 for local distribution at the request of multiple consignees who are not always known at the time the vehicle STARTS its journey", under the following conditions:

- (a) the carrier must use a monitoring system enabling the quantities delivered to each individual and the remaining quantity to be known at any time,
- (b) the carrier must return the remaining quantity after the entire transport operation (loading, delivery and return) to one of its identified loading/unloading points.