PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Alignment of the ADR 2009 with the existing ADR provisions

Marking provisions for road transportation of dangerous goods in limited quantities (LTD QTY) loaded in swap bodies

Transmitted by the International Federation of Freight Forwarders Associations (FIATA)

By introducing the ADR 2009 edition new marking provisions for the road carriage of limited quantities (LQ) enter into force by 1 January 2009.

Section 3.4.10 (a) ADR requires a new marking (LTD QTY) at the front and at the rear of road transport units with a maximum mass of more than 12 tons carrying dangerous goods in limited quantities exceeding 8 tons gross mass (according to 3.4.11).

Containers loaded with dangerous goods in limited quantities exceeding 8 tons gross mass (according to 3.4.11), on road transport units with a maximum mass of more than 12 tons, have to be marked on four sides (Section 3.4.10 (b)).

Whereas, WP. 15 did not elaborate clear provisions for the marking of swap bodies loaded with dangerous goods in limited quantities.

According to sub-section 5.3.1.2 (NOTE) of the present ADR, the placarding provisions for dangerous goods loaded in containers, MEGCs, tank-containers and portable tanks do not apply to swap-bodies, except tank swap bodies or swap-bodies carried in combined road/rail transport.

Although the definition for swap bodies is linked to the definition for containers, WP.15 has already agreed to this excluding principle because the use of the majority of swap bodies is limited to road transportation as bodies fixed to road vehicles/transport units. For the purposes of road carriage of dangerous goods loaded in swap bodies, the display of orange coloured plates on the transport unit is sufficient and no additional placarding of the swap body itself is required.
To avoid any inconsistency between the placarding provisions for dangerous goods and the marking provisions for dangerous goods in limited quantities, FIATA proposes to add a new NOTE after 3.4.10 (b):

“NOTE: 3.4.10 (b) does not apply to swap bodies on transport units that are marked at the front and, at the rear in accordance with 3.4.10 (a)”.

-----------------------------------------------