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**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

Eighty-seventh session  
Geneva, 2-6 November 2009  
Item 5 of the provisional agenda

**PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR**

**Carriage in limited quantities**

**Transmitted by the Government of Switzerland\***

**SUMMARY**

<i>Executive Summary:</i>	To exempt transport units containing limited quantities in accordance with chapter 3.4 from marking requirements when the quantities carried do not exceed the quantities referred to in 1.1.3.6.3
<i>Action to be taken:</i>	Amend the text of 3.4.11

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\* The present document is submitted in accordance with paragraph 1 (c) of the terms of reference of the Working Party, as contained in document ECE/TRANS/WP.15/190/Add.1, which provides a mandate to “Develop and update the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)”.

1. The new provisions of ADR 2009 introduced the obligation under 3.4.10 and 3.4.11 to mark transport units with a maximum mass exceeding 12 tonnes with the letters “LTD QTY” if the total gross mass of the packages does not exceed 8 tonnes per transport unit. The provisions of 3.4.10 and 3.4.11 of ADR 2009 have been designed so as to allow any transport unit exceeding 12 tonnes carrying a total gross mass of packages under 8 tonnes to dispense with the “LTD QTY” marking specified in 3.4.12. No exemption is stipulated for dangerous goods carried in limited quantities in accordance with chapter 3.4 that do not exceed the maximum quantities referred to in table 1.1.3.6.3. Such carriage is thus subject to vehicle marking regulations that are stricter than those for dangerous goods not exempted from the provisions of ADR in accordance with chapter 3.4.

2. The problem arises in particular in cases of unlimited quantities of transport category 4 substances that may be exempted from the requirements of orange-coloured plate marking, whereas vehicles carrying the same merchandise in packages that comply with the regulations of chapter 3.4 must always have a marking in accordance with 3.4.12 when the total gross mass of the quantity carried exceeds 8 tonnes. This relates only to UN numbers 1331, 1345, 1944, 1945, 2254 and 2623. The other transport category 4 substances may not be exempted from chapter 3.4, as they are assigned the code LQ0.

3. In order to put goods not exempted in accordance with chapter 3.4 on an equal footing with goods that are exempted in accordance with this chapter, it seems necessary to make provision for not marking these categories with “LTD QTY” in application of the regulations of 1.1.3.6.3.

### **Proposal**

4. Amend 3.4.11 to read:

“3.4.11 Markings specified in 3.4.10 may be dispensed with, if the gross mass of the packages containing dangerous goods packed in limited quantities carried does not exceed 8 tonnes per transport unit **or if the quantities carried do not exceed those specified in 1.1.3.6.3.**”

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