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Working Party on the Transport of Dangerous Goods

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Working Party on the Transport of Dangerous Goods

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Item 6 of the provisional agenda

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

Chapter 3.4. "Dangerous Good packed in Limited Quantities"

Transmitted by the International Federation of Freight Forwarders Associations (FIATA)^{1,2}

SUMMARY

Executive summary: Instructions to the consignor that the information of the amount of Limited Quantities handed over to the carrier for transport must be given in writing to the carrier.

Action to be taken: Text in Chapter 3.4.9., to be completed

Related documents: ECE/TRANS/WP.15/AC1/112.

¹ In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2009/5.

Introduction

1. To an increasing degree dangerous goods packed in limited quantities of Chapter 3.4 of the ADR are conveyed in part load/consolidated shipments. The aim of consolidated cargo is to group individual consignments and in this way to optimise the loading space and therefore to reduce the number of transports. This makes sense and is requested increasingly from an economical as well as from an environmental perspective. Particularly when transporting these goods over long distances it is quite frequent that single loads of 8 tons and more are grouped or co-loaded with other consignments.

2. The ADR provisions coming into force on 1 January 2009 require marking of containers on transport units and transport units carrying consignments of dangerous goods packed in limited quantities of more than 8 tonnes provided a transport unit with a maximum mass exceeding 12 tonnes is used. For this reason and further to the discussions, a general information requirement from the consignor to the carrier has been introduced in paragraph 3.4.9. The text, coming into force on 1 January, does not stipulate a particular form for the transfer of the information and therefore verbal or telephone transmission may be used. When single loads are consolidated there are often several intersections before a load has been consolidated. It is furthermore not unusual that a complete change of driver(s) and vehicle(s) prior to the final transport has been undertaken. Mistakes and errors may occur when data and information is transmitted in a non-prescribed form which opens for a variety of solutions of which several may not be appropriate or applicable. This may very well lead to misunderstandings or misinterpretations which cause a negative effect on safety in transport.

3. To minimize the risk for a reduction in safety and promote a clear understanding in communication between the consignor and the carrier it should be specified in 3.4.9 that the relevant information must be provided in **writing**.

Proposal

4. Amend paragraph **3.4.9** to read as follows:

"In advance of carriage, consignors of dangerous goods packed in limited quantities shall inform the carrier in writing of the total gross mass of such goods to be consigned".

Justification

5. The obligation to transmit the information in writing prevents mistakes and errors and therefore poses no threat to safety but instead ensure that a high safety level is maintained.

Feasibility

6. No problems are expected as the consignor does not have to complete an additional document. He can pick up the relevant information from the usual transport documents, e.g. delivery note, etc.
