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**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods****9 September 2011****Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods**

Geneva, 13-23 September 2011

Item 4 of the provisional agenda

**Harmonization with the United Nations Recommendations  
on the Transport of Dangerous Goods****Mixed loading of dangerous goods packed in limited  
quantities**Observations concerning document **ECE/TRANS/WP.15/AC.1/2011/30/Add.1****Transmitted by International Federation of Freight Forwarders Associations  
(FIATA)****Introduction**

1. Document ECE/TRANS/WP.15/AC.1/2011/30/Add.1 proposes to align RID/ADR/ADN with chapter 3.4.1 (g) of the United Nations Recommendations on the Transport of Dangerous Goods by introducing a new chapter 7.5.2.4 in RID/ADR/ADN prohibiting mixed loading of goods of Class 1 (except 1.4S) with goods of any other class including those packed in limited quantities.

According to the report of the Ad Hoc Working Group on Harmonisation of the RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods (Document ECE/TRANS/WP.15/AC.1/2011/30, item 30) the group did not unanimously decide as some participants considered that, as a matter principle and as currently in RID/ADR/ADN, there should be no segregation requirement for limited quantities, including for mixed loading with any kind of explosives.

Although being generally in favour of harmonisation to the widest possible extend FIATA wishes to join those delegates who have objected to this proposal.

**FIATA observations**

2. Modern logistics operations consolidate cargo, may it be non-dangerous, dangerous or dangerous goods in limited quantities, for joint carriages on the same transport unit. FIATA notices with concern that in recent years provisions for dangerous goods packed in limited quantities (LQ) became more and more extensive. Although LQ shipments in land transport still do not require full dangerous goods documentation, today, not only from freight forwarder's and logistics service provider's point of view, LQ shipments almost need to be

treated as regular dangerous goods in terms of weight limits, labelling, loading, unloading and handling, training of staff, vehicle placarding and tunnel regulations. By adding LQ shipments to the mixed loading provisions of RID/ADR/AND logistics operations become even more difficult to comply with regulations.

3. Looking to the sea mode regulations it becomes apparent that IMO DSC does not intend to change chapter 3.4 of the IMDG-Code. The draft version of IMDG-Code Amendment 36-12 chapter 3.4.4.2 (document DSC 16/3) still reads:

“3.4.4.2 The segregation provisions of chapters 7.2 to 7.7, including the segregation provisions in column (16) of the Dangerous Goods List, are not applicable for packaging containing dangerous goods in limited quantities or in relation to other dangerous goods. However articles of division 1.4 compatibility group S shall not be stowed in the same compartment or hold, or cargo transport unit with dangerous goods of class 1 of compatibility groups A and L”

### **Proposal**

In order to keep RID/ADR/ADN in line with IMDG-Code FIATA asks the Joint Meeting not to follow the Ad Hoc Working Group’s proposal for a new chapter 7.5.2.4.

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