Comments related to document 2015/35 submitted by the Government of Romania
Amendments to section 5.4.3 Instructions in writing in RID/ADR/ADN

Transmitted by the Government of Sweden

Summary

Sweden appreciates the work carried out by Romania presented in their document 2015/35. We support some of the proposals while we would like to propose an alternative solution to some others.

During the years when the written instructions have been in force, we have received a number of questions concerning the content in this four page model. Many carriers would like to adapt the information in order to obtain instructions more accurate and directly connected to the substance being carried. Also, the possibility to insert optional information related to the transport such as emergency telephone numbers, contact information to safety advisers, additional equipment required by the carrier etc., has been requested.

Furthermore, we have also received a request whether it would be possible to include a reference to 8.1.4 concerning fire extinguishers in order to have a more complete list of what equipment that is actually required. This seems relevant since the fire extinguishers are clearly referred to in the list of actions to be taken on the first page of the instructions in writing.

However, since ADR does not allow for any deviations from the four page model it is not possible to insert additional information even if it would improve the level of safety. When the instructions in writing first came into force, the intention was that these should be relatively intact and, thus, be able to use over a long period of time. However, since amendments continuously have been made to these instructions this has not been achieved. It is of course important to make amendments when improvements are necessary, but it would be of advantage if we could find a way to make the instructions in writing more independent of adjustments in certain details, e.g. concerning required equipment.

The list of equipment in the instructions is only a reproduction of what is required in 8.1.5. Since the equipment depends on what kind of substance
that is being carried, some of the listed equipment may not be relevant for a
transport and are, subsequently, superfluous information in the instructions in
writing. Instead, it would be beneficial enabling for carriers to complement
their instructions with information they find helpful.

In order to make the instructions in writing more permanent, and to enable
for carriers to adapt the information in these, Sweden proposes to amend the
last page of the instructions, listing the equipment. Since RID does allow for
some adjustments in the instructions in writing, two separate solutions are
proposed.

**Proposals**

Amend the last page of the instructions in writing for ADR (see annex for
amendments in ADR with tracked changes) and RID respectively, to read as
follows (new text underlined):
ADR (page 4, instructions in writing)

Additional guidance to members of the vehicle crew on the hazard characteristics of dangerous goods, indicated by marks, and on actions subject to prevailing circumstances

<table>
<thead>
<tr>
<th>Mark</th>
<th>Hazard characteristics</th>
<th>Additional guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
<td>(2)</td>
<td>(3)</td>
</tr>
<tr>
<td></td>
<td>Risk to the aquatic environment or the sewerage system</td>
<td></td>
</tr>
<tr>
<td>Environmentally hazardous substances</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Risk of burns by heat.</td>
<td>Avoid contact with hot parts of the transport unit and the spilled substance.</td>
</tr>
<tr>
<td>Elevated temperature substances</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Proposal 1

**Equipment**

The provisions concerning [fire-fighting equipment in 8.1.4 and] miscellaneous equipment and equipment for personal protection in 8.1.5 shall be applied.

Proposal 2

**Information**

Optional information and notes [related to the dangerous goods carried] may be inserted below:
RID (page 4, instructions in writing)

<table>
<thead>
<tr>
<th>Mark (1)</th>
<th>Hazard characteristics (2)</th>
<th>Additional guidance (3)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Risk to the aquatic environment or the sewage system.</td>
<td>Avoid contact with hot parts of the wagon or container and the spilled substance.</td>
</tr>
<tr>
<td></td>
<td>Risk of burns by heat.</td>
<td></td>
</tr>
</tbody>
</table>

**Equipment for personal protection to be carried in the driver's cab**

The following equipment shall be carried in the driver's cab:

- portable lighting apparatus;
- for the driver
- suitable warning clothing.

* The equipment to be kept available shall, if necessary, be supplemented according to existing national specifications.

**Proposal 3**

**Information**

Optional information and notes [related to the dangerous goods carried] may be inserted below:
Annex

Proposed amendments in ADR. New text underlined, deleted text stricken out.

### Additional guidance to members of the vehicle crew on the hazard characteristics of dangerous goods, indicated by marks, and on actions subject to prevailing circumstances

<table>
<thead>
<tr>
<th>Mark</th>
<th>Hazard characteristics</th>
<th>Additional guidance</th>
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</thead>
<tbody>
<tr>
<td>(1)</td>
<td>(2)</td>
<td>(3)</td>
</tr>
<tr>
<td><img src="image" alt="Environmentally hazardous substances" /></td>
<td>Risk to the aquatic environment or the sewerage system</td>
<td></td>
</tr>
<tr>
<td><img src="image" alt="Elevated temperature substances" /></td>
<td>Risk of burns by heat.</td>
<td>Avoid contact with hot parts of the transport unit and the spilled substance.</td>
</tr>
</tbody>
</table>

**Equipment**

The provisions concerning fire-fighting equipment in 8.1.4 and miscellaneous equipment and equipment for personal protection in 8.1.5 shall be applied.

**Information**

Optional information and notes related to the dangerous goods carried may be inserted below:

**Equipment for personal and general protection**

to carry out general actions and hazard specific emergency actions to be carried on board the vehicle in accordance with section 8.1.5 of ADR

The following equipment shall be carried on board the transport unit:

- for each vehicle, a wheel chock of a size suited to the maximum mass of the vehicle and to the diameter of the wheel;
- two self-standing warning signs;
- eye rinsing liquid*;

for each member of the vehicle crew

*Not required for danger label numbers 1, 1.4, 1.5, 1.6, 2.1, 2.2 and 2.3.
— a warning vest;
— portable lighting apparatus;
— a pair of protective gloves; and
— eye protection.

Additional equipment required for certain classes:

— an emergency escape mask for each member of the vehicle crew shall be carried on board the vehicle for danger label numbers 2.3 or 6.1;
— a shovel
— a drain seal
— a collecting container.

\*\* Only required for solids and liquids with danger label numbers 3, 4.1, 4.3, 8 or 9.\*\*