

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

8 September 2015

**Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods**

Geneva, 15–25 September 2015

Item 3 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
new proposals**

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

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)

Additional guidance to drivers on the hazard characteristics of dangerous goods, indicated by marks, and on actions subject to prevailing circumstances		
Mark (1)	Hazard characteristics (2)	Additional guidance (3)
	Risk to the aquatic environment or the sewage system.	
	Risk of burns by heat.	Avoid contact with hot parts of the wagon or container and the spilled substance.

Equipment for personal protection to be carried in the driver's cab
<p>The following equipment³ shall be carried in the driver's cab:</p> <ul style="list-style-type: none"> - portable lighting apparatus: for the driver - suitable warning clothing.

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

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^a; and

for each member of the vehicle crew

^a — 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^b;~~
 - ~~—— a drain seal^b;~~
 - ~~—— a collecting container^b.~~
-

^b ~~—— Only required for solids and liquids with danger label numbers 3, 4.1, 4.3, 8 or 9.~~