

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

30 June 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 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
pending issues**

Loader and unloader

Transmitted by the Governments of Sweden and Spain

Annex to ECE/TRANS/WP.15/AC.1/2015/37

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
FOREWORD	Structure of Annexes A and B ... Part 7 Provisions concerning the conditions of carriage, loading, unloading and handling	Spain: Refers to all 3 meanings	
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Index	8.3.6 Running the engine during loading or unloading 559	Spain: Refers to all 3 meanings	
1.1.2.1	For the purposes of Article 2 of ADR, Annex A specifies: (a) Dangerous goods which are barred from international carriage; (b) Dangerous goods which are authorized for international carriage and the conditions attaching to them (including exemptions) particularly with regard to: - classification of goods, including classification criteria and relevant test methods; - use of packagings (including mixed packing); - use of tanks (including filling); - consignment procedures (including marking and labelling of packages and placarding and marking of means of transport as well as documentation and information required); - provisions concerning the construction, testing and approval of packagings and tanks; - use of means of transport (including loading, mixed loading and unloading).	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
Definitions	" <i>Exclusive use</i> ", for the carriage of radioactive material, means the sole use, by a single consignor, of a vehicle or of a large container, in respect of which all initial, intermediate and final loading and unloading and shipment are carried out in accordance with the directions of the consignor or consignee, where so required by ADR;	Spain: Refers to all 3 meanings	
Definitions	" <i>Full load</i> " means any load originating from one consignor for which the use of a vehicle or of a large container is exclusively reserved and all operations for the loading and unloading of which are carried out in conformity with the instructions of the consignor or of the consignee;	Spain: Refers to all 3 meanings	
Definitions	" <i>Unloader</i> " means any enterprise which: (b) Unloads packaged dangerous goods, small containers or portable tanks out of or from a vehicle or a container; or	Spain: Here obviously, as we are in the definition for unloader, only the unload-packages acceptance is meant.	
Definitions	" <i>Vacuum-operated waste tank</i> " means a fixed tank, demountable tank, tank-container or tank swap body primarily used for the carriage of dangerous wastes, with special constructional features and/or equipment to facilitate the loading and unloading of wastes as specified in Chapter 6.10. A tank which fully complies with the requirements of Chapter 6.7 or 6.8 is not considered to be a vacuum-operated waste tank;	Spain: Unloading is used, but discharging is really meant!! In fact, here they already use unloading as all three acceptations (remove, unload, discharge). (OTIF:) As the unpackaged goods are meant, the right wording should be "filling and discharging".	the right wording should be "filling and discharging"

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
1.4.2.2.4	<p>If, during the journey, an infringement which could jeopardize the safety of the operation is observed,</p> <p>the consignment shall be halted as soon as possible bearing in mind the requirements of traffic safety,</p> <p>of the safe immobilisation of the consignment, and of public safety. The transport operation may only</p> <p>be continued once the consignment complies with applicable regulations. The competent authority(ies) concerned by the rest of the journey may grant an authorization to pursue the transport operation.</p> <p>In case the required compliance cannot be achieved and no authorization is granted for the rest of the</p> <p>journey, the competent authority(ies) shall provide the carrier with the necessary administrative assistance. The same shall apply in case the carrier informs this/these competent authority(ies) that the</p> <p>dangerous nature of the goods carried was not communicated to him by the consignor and that he</p> <p>wishes, by virtue of the law applicable in particular to the contract of carriage, to unload, destroy or</p> <p>render the goods harmless.</p>	Spain: Refers to all 3 meanings	
1.4.2.3.1	The consignee has the obligation not to defer acceptance of the goods without compelling reasons and to verify, after unloading, that the requirements of ADR concerning him have been complied with	Spain: Refers to all 3 meanings	
1.4.2.3.3	3 If the consignee makes use of the services of other participants (unloader, cleaner, decontamination facility, etc.) he shall take appropriate measures to ensure that the requirements of 1.4.2.3.1 and 1.4.2.3.2 of ADR have been complied with.	Spain: Unloader, already defined	

Article	Text	Comments	Changes proposed
1.4.3.7	<p><i>Unloader</i></p> <p><i>NOTE: In this sub-section, unloading covers removal, unloading and discharging as indicated in the definition of unloader in 1.2.1.</i></p>	<p>Spain: This note would not be necessary any more; clearly in this sub-section unloading already covers removal and discharging.</p> <p>Unloader, already defined</p>	
1.4.3.7.1	<p>1 In the context of 1.4.1, the unloader shall in particular:</p> <p>(a) Ascertain that the correct goods are unloaded by comparing the relevant information on the transport document with the information on the package, container, tank, MEMU, MEGC or vehicle;</p> <p>(b) Before and during unloading, check whether the packagings, the tank, the vehicle or container have been damaged to an extent which would endanger the unloading operation. If this is the case, ascertain that unloading is not carried out until appropriate measures have been taken;</p> <p>(c) Comply with all relevant requirements concerning unloading;</p> <p>(d) Immediately following the unloading of the tank, vehicle or container:</p> <p>(i) Remove any dangerous residues which have adhered to the outside of the tank, vehicle or container during the process of unloading; and</p> <p>(ii) Ensure the closure of valves and inspection openings;</p> <p>- 41 -</p> <p>(e) Ensure that the prescribed cleaning and decontamination of the vehicles or containers is carried out; and</p> <p>(f) Ensure that the containers once completely unloaded, cleaned and decontaminated, no longer display danger markings conforming to Chapter 5.3.</p>	<p>Spain: Refers to all 3 meanings</p>	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
1.4.3.7.2	If the unloader makes use of the services of other participants (cleaner, decontamination facility, etc.) he shall take appropriate measures to ensure that the requirements of ADR have been complied with.	Spain: Refers to all 3 meanings	
1.7.1.3	ADR applies to the carriage of radioactive material by road including carriage which is incidental to the use of the radioactive material. Carriage comprises all operations and conditions associated with and involved in the movement of radioactive material; these include the design, manufacture, maintenance and repair of packaging, and the preparation, consigning, loading, carriage including intransit storage, unloading and receipt at the final destination of loads of radioactive material and packages. A graded approach is applied to the performance standards in ADR that are characterized by three general severity levels:	Spain: Refers to all 3 meanings	
1.8.3.1	Each undertaking, the activities of which include the carriage, or the related packing, loading, filling or unloading, of dangerous goods by road shall appoint one or more safety advisers for the carriage of dangerous goods, responsible for helping to prevent the risks inherent in such activities with regard to persons, property and the environment.	Spain: Refers to all 3 meanings	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
1.8.3.2	<p>The competent authorities of the Contracting Parties may provide that these requirements shall not apply to undertakings:</p> <p>(a) The activities of which concern quantities in each transport unit smaller than those referred to in 1.1.3.6, 1.7.1.4 and in Chapters 3.3, 3.4 and 3.5; or</p> <p>(b) The main or secondary activities of which are not the carriage or the related loading or unloading of dangerous goods but which occasionally engage in the national carriage or the related loading or unloading of dangerous goods posing little danger or risk of pollution.</p>	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
1.8.3.3	<p>The main task of the adviser shall be, under the responsibility of the head of the undertaking, to seek by all appropriate means and by all appropriate action, within the limits of the relevant activities of that undertaking, to facilitate the conduct of those activities in accordance with the requirements applicable and in the safest possible way.</p> <p>With regard to the undertaking's activities, the adviser has the following duties in particular:</p> <ul style="list-style-type: none"> - monitoring compliance with the requirements governing the carriage of dangerous goods; - advising his undertaking on the carriage of dangerous goods; - preparing an annual report to the management of his undertaking or a local public authority, as appropriate, on the undertaking's activities in the carriage of dangerous goods. Such annual reports shall be preserved for five years and made available to the national authorities at their request. <p>The adviser's duties also include monitoring the following practices and procedures relating to the relevant activities of the undertaking:</p> <ul style="list-style-type: none"> - the procedures for compliance with the requirements governing the identification of dangerous goods being transported; - the undertaking's practice in taking account, when purchasing means of transport, of any special requirements in connection with the dangerous goods being transported; - the procedures for checking the equipment used in connection with the carriage, loading or unloading of dangerous goods; - the proper training of the undertaking's employees, including on the changes to the regulations, and the maintenance of records of such training; - the implementation of proper emergency procedures in the event of any accident or incident that may affect safety during the carriage, loading or unloading of dangerous goods; - investigating and, where appropriate, preparing reports on serious accidents, incidents or serious infringements recorded during the carriage, loading or unloading of dangerous goods; - the implementation of appropriate measures to avoid the recurrence of accidents, incidents or serious infringements; - the account taken of the legal prescriptions and special requirements associated with the 	Spain: Refers to all 3 meanings	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
1.8.3.6	Whenever an accident affects persons, property or the environment or results in damage to property or the environment during carriage, loading or unloading carried out by the undertaking concerned, the adviser shall, after collecting all the relevant information, prepare an accident report to the management of the undertaking or to a local public authority, as appropriate. That report shall not replace any report by the management of the undertaking which might be required under any other international or national legislation	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
1.8.3.11	<p>The aim of the examination is to ascertain whether candidates possess the necessary level of knowledge to carry out the duties incumbent upon a safety adviser as listed in 1.8.3.3, for the purpose of obtaining the certificate prescribed in sub-section 1.8.3.7, and it shall cover at least the following subjects:</p> <p>(a) Knowledge of the types of consequences which may be caused by an accident involving dangerous goods and knowledge of the main causes of accidents;</p> <p>(b) Requirements under national law, international conventions and agreements, with regard to the following in particular:</p> <ul style="list-style-type: none"> - classification of dangerous goods (procedure for classifying solutions and mixtures, structure of the list of substances, classes of dangerous goods and principles for their classification, nature of dangerous goods transported, physical, chemical and toxicological properties of dangerous goods); - general packing provisions, provisions for tanks and tank-containers (types, code, marking, construction, initial and periodic inspection and testing); - 64 - - marking and labelling, placarding and orange plates marking (marking and labelling of packages, placing and removal of placards and orange plates); - particulars in transport documents (information required); - method of consignment and restrictions on dispatch (full load, carriage in bulk, carriage in intermediate bulk containers, carriage in containers, carriage in fixed or demountable tanks); - transport of passengers; - prohibitions and precautions relating to mixed loading; - segregation of goods; - limitation of the quantities carried and quantities exemptions; - handling and stowage (loading and unloading - filling ratios -, stowage and segregation); - cleaning and/or degassing before loading and after unloading; - crews vocational training; 	Spain: Refers to all 3 meanings	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
1.8.3.18	<p><i>Form of certificate</i></p> <p>Certificate of training as safety adviser for the transport of dangerous goods</p> <p>Certificate No:</p> <p>Distinguishing sign of the State issuing the certificate:</p> <p>Surname:</p> <p>Forename(s):</p> <p>Date and place of birth:</p> <p>Nationality:</p> <p>Signature of holder:</p> <p>Valid until for undertakings which transport dangerous goods and for undertakings which carry out related loading or unloading:</p>	Spain: Refers to all 3 meanings	
1.8.5.1	<p>1 If a serious accident or incident takes place during loading, filling, carriage or unloading of dangerous goods on the territory of a Contracting Party, the loader, filler, carrier or consignee, respectively, shall ascertain that a report conforming to the model prescribed in 1.8.5.4 is made to the competent authority of the Contracting Party concerned at the latest one month after the occurrence.</p>	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
1.8.5.4	<p>1. Mode</p> <p><input type="checkbox"/> Rail</p> <p>Wagon number (optional)</p> <p>.....</p> <p><input type="checkbox"/> Road</p> <p>Vehicle registration (optional)</p> <p>.....</p> <p>2. Date and location of occurrence</p> <p>Year: Month: Day: Time:</p> <p>.....</p> <p>Rail</p> <p><input type="checkbox"/> Station</p> <p><input type="checkbox"/> Shunting/marshalling yard</p> <p><input type="checkbox"/> Loading/unloading/transshipment site</p> <p>Location / Country:</p> <p>or</p> <p><input type="checkbox"/> Open line:</p> <p>Description of line:</p> <p>Kilometres:</p> <p>Road</p> <p><input type="checkbox"/> Built-up area</p> <p><input type="checkbox"/> Loading/unloading/transshipment site</p> <p><input type="checkbox"/> Open road</p> <p>Location / Country:</p> <p>3. Topography</p> <p><input type="checkbox"/> Gradient/incline</p> <p><input type="checkbox"/> Tunnel</p> <p><input type="checkbox"/> Bridge/Underpass</p> <p><input type="checkbox"/> Crossing</p> <p>4. Particular weather conditions</p> <p><input type="checkbox"/> Rain</p>	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
3.2.1	<p>Column (16) "Special provisions for carriage - Packages"</p> <p>Contains the alphanumeric code(s), starting with letter "V", of the applicable special provisions (if any) for carriage in packages. These are listed in 7.2.4. General provisions concerning the carriage in packages are to be found in Chapters 7.1 and 7.2.</p> <p><i>NOTE: In addition, special provisions indicated in Column (18), concerning loading, unloading and handling, shall be observed.</i></p>	Spain: Refers to all 3 meanings	
	<p>Column (17) "Special provisions for carriage - Bulk"</p> <p>Contains the alphanumeric code(s), starting with letters "VC", as well as the alphanumeric code(s) starting with letters "AP", of the applicable provisions for carriage in bulk. These are listed in 7.3.3. If no code or a reference to a specific paragraph is given, carriage in bulk is not permitted. General and additional provisions concerning carriage in bulk are to be found in Chapters 7.1 and 7.3.</p> <p><i>NOTE: In addition, special provisions indicated in Column (18), concerning loading, unloading and handling, shall be observed.</i></p>	Spain: Refers to all 3 meanings	
3.2.1	<p>Column (18) "Special provisions for carriage - Loading and unloading"</p> <p>Contains the alphanumeric code(s), starting with letters "CV", of the applicable special provisions for loading, unloading and handling. These are listed in 7.5.11. If no code is given, only the general provisions apply (see 7.5.1 to 7.5.10).</p>	Spain: Refers to all 3 meanings	
Table A, heading	(18) Loading, unloading and handling	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
	<p>225 Fire extinguishers under this entry may include installed actuating cartridges (cartridges, power device of classification code 1.4C or 1.4S), without changing the classification of Class 2, group A or O according to 2.2.2.1.3 provided the total quantity of deflagrating (propellant) explosives does not exceed 3.2 g per extinguishing unit. Fire extinguishers shall be manufactured, tested, approved and labelled according to the provisions applied in the country of manufacture.</p> <p><i>NOTE: "Provisions applied in the country of manufacture" means the provisions applicable in the country of manufacture or those applicable in the country of use.</i></p> <p>Fire extinguishers under this entry include:</p> <ul style="list-style-type: none"> (a) portable fire extinguishers for manual handling and operation; (b) fire extinguishers for installation in aircraft; (c) fire extinguishers mounted on wheels for manual handling; (d) fire extinguishing equipment or machinery mounted on wheels or wheeled platforms or units carried similar to (small) trailers, and (e) fire extinguishers composed of a non-rollable pressure drum and equipment, and handled e.g. by fork lift or crane when loaded or unloaded. <p><i>NOTE: Pressure receptacles which contain gases for use in the above-mentioned fire extinguishers or for use in stationary fire-fighting installations shall meet the requirements of Chapter 6.2 and all requirements applicable to the relevant gas when these pressure receptacles are carried separately.</i></p>	<p>Spain: Here only the unloading of packaged dangerous goods is meant. But as it is explicitly spoken about the unloading of fire extinguishers with a crane, the situation is quite accurately described, and no possibility of misinterpretation exists.</p>	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
5.4.1.2.5.1	<p>The following information shall be inserted in the transport document for each consignment of Class 7 material, as applicable, in the order given and immediately after the information required under 5.4.1.1.1 (a) to (c) and (k):</p> <p>(a) The name or symbol of each radionuclide or, for mixtures of radionuclides, an appropriate general description or a list of the most restrictive nuclides;</p> <p>(b) A description of the physical and chemical form of the material, or a notation that the material is special form radioactive material or low dispersible radioactive material. A generic chemical description is acceptable for chemical form. For radioactive material with a subsidiary risk, see sub-paragraph (c) of special provision 172 of Chapter 3.3;</p> <p>(c) The maximum activity of the radioactive contents during carriage expressed in becquerels (Bq) with an appropriate SI prefix symbol (see 1.2.2.1). For fissile material, the mass of fissile material (or mass of each fissile nuclide for mixtures when appropriate) in grams (g), or appropriate multiples thereof, may be used in place of activity;</p> <p>(d) The category of the package, i.e. I-WHITE, II-YELLOW, III-YELLOW;</p> <p>(e) The transport index (categories II-YELLOW and III-YELLOW only);</p> <p>(f) For fissile material:</p> <p>(i) Shipped under one exception of 2.2.7.2.3.5 (a) to (f), reference to that paragraph;</p> <p>(ii) Shipped under 2.2.7.2.3.5 (c) to (e), the total mass of fissile nuclides;</p> <p>(iii) Contained in a package for which one of 6.4.11.2 (a) to (c) or 6.4.11.3 is applied, reference to that paragraph;</p> <p>(iv) The criticality safety index, where applicable;</p> <p>(g) The identification mark for each competent authority certificate of approval (special form radioactive material, low dispersible radioactive material, fissile material excepted under 2.2.7.2.3.5 (f), special arrangement, package design, or shipment) applicable to the consignment;</p> <p>(h) For consignments of more than one package, the information required in 5.4.1.1.1 and in (a) to (g) above shall be given for each package. For packages in an overpack, container, or vehicle, a detailed statement of the contents of each package within the overpack, container, or vehicle</p>	<p>Spain: Here only the unloading of packaged dangerous goods is meant. But as it is explicitly spoken about the unloading of packages, the situation is quite accurately described, and no possibility of misinterpretation exists.</p>	

Article	Text	Comments	Changes proposed
5.4.1.2.5.4	<i>The applicable competent authority certificates need not necessarily accompany the consignment.</i> The consignor shall make them available to the carrier(s) before loading and unloading.	Spain: Refers to all 3 meanings	
5.5.2.3.1	<p>A fumigated cargo transport unit shall be marked with a warning mark, as specified in 5.5.2.3.2, affixed at each access point in a location where it will be easily seen by persons opening or entering the cargo transport unit. This mark shall remain on the cargo transport unit until the following provisions are met:</p> <p>(a) The fumigated cargo transport unit has been ventilated to remove harmful concentrations of fumigant gas; and</p> <p>(b) The fumigated goods or materials have been unloaded.</p>	<p>Spain: Here only the unloading of packaged dangerous goods from inside a container is meant. Reference is made to the fumigated goods or material, so it seems clear. For further clarity perhaps it would be useful to add "out of or from the cargo transport unit" (same wording than in 1.2.1, second indent) to avoid that someone thinks that removing the cargo transport unit from a vehicle is enough...</p> <p>Sweden: no change necessary</p>	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
5.5.2.3.4	When the fumigated cargo transport unit has been ventilated and unloaded, the fumigation warning mark shall be removed.	<p>Spain: Here only the unloading of packaged dangerous goods from inside a container is meant. Reference is made to the cargo transport unit, but not to the fumigated goods or material. Perhaps it would be useful to include “the fumigated goods or materials” before unloaded, to avoid that someone thinks that removing the cargo transport unit from a vehicle is enough...</p> <p>Sweden: no change necessary, text is clear enough as it is. Also, this is UN text.</p>	<p>Spain: include “the fumigated goods or materials” before unloaded ?</p> <p>Sweden: no change necessary</p>

Article	Text	Comments	Changes proposed
5.5.3.6.1	<p>Vehicles and containers containing dangerous goods used for cooling or conditioning purposes shall</p> <p>be marked with a warning mark, as specified in 5.5.3.6.2 affixed at each access point in a location</p> <p>where it will be easily seen by persons opening or entering the vehicle or container. This mark shall</p> <p>remain on the vehicle or container until the following provisions are met:</p> <p>(a) The vehicle or container has been ventilated to remove harmful concentrations of coolant or conditioner; and</p> <p>(b) The cooled or conditioned goods have been unloaded</p>	<p>Spain: Here only the unloading of packaged dangerous goods from inside a vehicle or container is meant. Reference is made to the cooled or conditioned goods, so it seems clear. For further clarity perhaps it would be useful to add “out of or from the vehicle or container” (same wording than in 1.2.1, second indent) to avoid that someone thinks that removing the container unit from a vehicle is enough...</p> <p>Sweden: no change necessary, text is clear enough as it is</p>	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
6.4.23.5	<p>An application for approval of a Type B(M) package design shall include, in addition to the general information required in 6.4.23.4 for Type B(U) packages:</p> <p>(a) A list of the requirements specified in 6.4.7.5, 6.4.8.4 to 6.4.8.6 and 6.4.8.9 to 6.4.8.15 with which the package does not conform;</p> <p>(b) Any proposed supplementary operational controls to be applied during carriage not regularly provided for in this Annex, but which are necessary to ensure the safety of the package or to compensate for the deficiencies listed in (a) above;</p> <p>(c) A statement relative to any restrictions on the mode of carriage and to any special loading, carriage, unloading or handling procedures; and</p> <p>(d) A statement of the range of ambient conditions (temperature, solar radiation) which are expected to be encountered during carriage and which have been taken into account in the design.</p>	Spain: Refers to all 3 meanings	
6.4.23.15	<p>(l) A detailed listing of any supplementary operational controls required for preparation, loading, carriage, unloading and handling of the consignment, including any special stowage provisions</p> <p>for the safe dissipation of heat;</p>	Spain: Refers to all 3 meanings	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
6.4.23.16	<p>16 Each certificate of approval for a shipment issued by a competent authority shall include the following information:</p> <p>(a) Type of certificate;</p> <p>(b) The competent authority identification mark(s);</p> <p>(c) The issue date and an expiry date;</p> <p>(d) List of applicable national and international regulations, including the edition of the IAEA Regulations for the Safe Transport of Radioactive Material under which the shipment is approved;</p> <p>(e) Any restrictions on the modes of carriage, type of vehicle, container, and any necessary routing instructions;</p> <p>(f) The following statement: "This certificate does not relieve the consignor from compliance with any requirement of the government of any country through or into which the package will be carried.";</p> <p>(g) A detailed listing of any supplementary operational controls required for preparation, loading, carriage, unloading and handling of the consignment, including any special stowage provisions for the safe dissipation of heat or maintenance of criticality safety;</p> <p>(h) Reference to information provided by the applicant relating to specific actions to be taken prior to shipment;</p> <p>(i) Reference to the applicable certificate(s) of approval of design;</p> <p>(j) A specification of the actual radioactive contents, including any restrictions on the radioactive contents which might not be obvious from the nature of the packaging. This shall include the physical and chemical forms, the total activities involved (including those of the various isotopes, if appropriate), mass in grams (for fissile material or for each fissile nuclide when appropriate), and whether special form radioactive material, low dispersible radioactive material or fissile material excepted under 2.2.7.2.3.5 (f) if applicable;;</p> <p>(k) Any emergency arrangements deemed necessary by the competent authority;</p> <p>(l) A specification of the applicable management system as required in 1.7.3;</p> <p>(m) If deemed appropriate by the competent authority, reference to the identity of the applicant;</p>	Spain: Refers to all 3 meanings	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
6.4.23.17	q) A detailed listing of any supplementary operational controls required for preparation, loading, carriage, unloading and handling of the consignment, including any special stowage provisions for the safe dissipation of heat;	Spain: Refers to all 3 meanings	
7	PART 7 Provisions concerning the conditions of carriage, loading, unloading and handling	Spain: Refers to all 3 meanings	
7.1.1	The carriage of dangerous goods is subject to the mandatory use of a particular type of transport equipment in accordance with the provisions of this Chapter and Chapter 7.2 for carriage in packages, Chapter 7.3 for carriage in bulk and Chapter 7.4 for carriage in tanks. In addition, the provisions of Chapter 7.5 concerning loading, unloading and handling shall be observed.	Spain: Refers to all 3 meanings	
	AP2 Vehicles and containers shall have adequate ventilation.		
7.3.3.2.3 <i>Goods of Class 4.3</i>	AP3 Sheeted vehicles and sheeted containers shall be used only when the substance is in pieces (not in powder, granular, dust or ashes form). AP4 Closed vehicles and closed containers shall be equipped with hermetically closed openings used for loading and unloading to prevent the exit of gas and exclude the ingress of moisture. AP5 The cargo doors of the closed vehicles or closed containers shall be marked with the following in letters not less than 25 mm high: "WARNING NO VENTILATION OPEN WITH CAUTION" This shall be in a language considered appropriate by the consignor.	Spain: Only the concept of discharging is meant (As reference is made to the openings for loading and unloading, text seems is enough as it is. (OTIF:) Only the concept of discharging is meant (carriage in bulk, i.e. unpackaged goods). The right wording should be "filling and discharging".	The right wording should be "filling and discharging".
CHAPTER 7.5	PROVISIONS CONCERNING LOADING, UNLOADING AND HANDLING	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
7.5.1	<p>General provisions concerning loading, unloading and handling</p> <p><i>NOTE: Within the meaning of this section, placing a container, bulk-container, tank-container or portable tank onto a vehicle is considered as loading, and removing it is considered as unloading</i></p>	<p>Spain: This note would not be necessary. Clearly in this section all the references are related to all three meanings.</p>	
7.5.1.1	<p>The vehicle and its driver, as well as the large container(s), bulk-container(s), tank-container(s) or portable tank(s) if any, shall comply with the regulatory provisions (especially those concerning safety, security, cleanliness and satisfactory operation of the equipment used in loading and unloading) upon arrival at the loading and unloading sites, which include container terminals</p>	<p>Spain: Refers to all 3 meanings</p>	
7.5.1.2	<p>Unless otherwise specified in ADR, the loading shall not be carried out if:</p> <p>(a) an examination of the documents; or</p> <p>(b) a visual inspection of the vehicle or of the large container(s), bulk-container(s), tankcontainer(s) or portable tank(s) if any, as well as of their equipment used in loading and unloading, shows that the vehicle, the driver, a large container, a bulk-container, a tank-container, a portable tank or their equipment do not comply with the regulatory provisions. The interior and exterior of a vehicle or container shall be inspected prior to loading to ensure that there is no damage that could affect its integrity or that of the packages to be loaded in it.</p>	<p>Spain: Refers to all 3 meanings</p>	
7.5.1.3	<p>Unless otherwise specified in ADR, the unloading shall not be carried out, if the above-mentioned inspections reveal deficiencies that might affect the safety or the security of the unloading.</p>	<p>Spain: Refers to all 3 meanings</p>	
7.5.1.4	<p>In accordance with the special provisions of 7.3.3 or 7.5.11, in conformity with Columns (17) and (18) of Table A of Chapter 3.2, certain dangerous goods shall only be forwarded as a "full load" (see definition in 1.2.1). In such a case, the competent authorities may require the vehicle or large container used for such carriage to be loaded at only one point and unloaded at only one point.</p>	<p>Spain: Refers to all 3 meanings</p>	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
7.5.1.6	All means of containment shall be loaded and unloaded in conformity with a handling method for which they have been designed and, where required, tested.	Spain: Refers to all 3 meanings	
7.5.4	<p>Precautions with respect to foodstuffs, other articles of consumption and animal feeds</p> <p>If special provision CV28 is indicated for a substance or article in Column (18) of Table A of Chapter 3.2, precautions with respect to foodstuffs, other articles of consumption and animal feeds shall be taken as follows.</p> <p>Packages as well as uncleaned empty packagings, including large packagings and intermediate bulk containers (IBCs), bearing labels conforming to models Nos. 6.1 or 6.2 and those bearing labels conforming to model No. 9 containing goods of UN Nos. 2212, 2315, 2590, 3151, 3152 or 3245, shall not be stacked on or loaded in immediate proximity to packages known to contain foodstuffs, other articles of consumption or animal feeds in vehicles, in containers and at places of loading, unloading or transshipment.</p> <p>When these packages, bearing the said labels, are loaded in immediate proximity of packages known to contain foodstuffs, other articles of consumption or animal feeds, they shall be kept apart from the latter:</p> <p>(a) By complete partitions which should be as high as the packages bearing the said labels;</p> <p>(b) By packages not bearing labels conforming to models Nos. 6.1, 6.2 or 9 or packages bearing labels conforming to model No.9 but not containing goods of UN Nos. 2212, 2315, 2590, 3151, 3152 or 3245; or</p> <p>(c) By a space of at least 0.8 m;</p> <p>unless the packages bearing the said labels are provided with an additional packaging or are completely covered (e.g. by a sheeting, a fibreboard cover or other measures).</p>	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
7.5.7.3	<p>3 During loading and unloading, packages containing dangerous goods shall be protected from being damaged.</p> <p><i>NOTE: Particular attention shall be paid to the handling of packages during their preparation for carriage, the type of vehicle or container on which they are to be carried and to the method of loading or unloading, so that accidental damage is not caused through dragging or mishandling the packages.</i></p>	<p>Spain: Both times unloading refers only to the unloading of packages. But as an explicit reference to packages is made in the text, text is clear as it is</p>	
7.5.7.4	<p>4 The provisions of 7.5.7.1 also apply to the loading, stowage and unloading of containers, tankcontainers, portable tanks and MEGCs on to and from vehicles.</p>	<p>Spain: Refers only to removing. Clear because the complete reference to unloading containers, tank containers... on to and from vehicles are mentioned. To improve clarity, substitute by removal</p>	<p>Spain: To improve clarity, substitute "loading" with "removal"??</p>
7.5.8	<p>Cleaning after unloading</p>	<p>Spain: See below</p>	
7.5.8.1	<p>If, when a vehicle or container which has contained packaged dangerous goods is unloaded, some of the contents are found to have escaped, the vehicle or container shall be cleaned as soon as possible and in any case before reloading.</p> <p>If it is not possible to do the cleaning locally, the vehicle or container shall be carried, with due regard to adequate safety, to the nearest suitable place where cleaning can be carried out.</p> <p>Carriage is adequately safe if suitable measures have been taken to prevent the uncontrolled release of the dangerous goods that have escaped.</p>	<p>Spain: Here only the unload meaning is intended. But already the texts refers to the packaged dangerous goods which are unloaded, so it cannot be misinterpreted even if unloaded refers collectively to discharge, remove and unload</p>	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
7.5.11	<p>Additional provisions applicable to certain classes or specific goods</p> <p>In addition to the provisions of sections 7.5.1 to 7.5.10, the following provisions shall apply when</p> <p>they are shown under an entry indicated in Column (18) of Table A of Chapter 3.2.</p> <p>CV1 (1) The following operations are prohibited:</p> <p>(a) Loading or unloading goods in a public place in a built-up area without special permission from the competent authorities;</p> <p>(b) Loading or unloading goods in a public place elsewhere than in a built-up area without prior notice thereof having been given to the competent authorities, unless these operations are urgently necessary for reasons of safety.</p> <p>(2) If, for any reason, handling operations have to be carried out in a public place, then substances and articles of different kinds shall be separated according to the labels.</p>	<p>Refers at least to unloading and discharging; but reference to removing is perhaps not intended.¿?</p> <p>On the other hand, applies additionally to 7.5.1, and there all three meanings are explicitly included...</p>	
7.5.11	<p>CV2 (1) Before loading, the loading surface of the vehicle or container shall be thoroughly cleaned.</p> <p>(2) The use of fire or naked flame shall be prohibited on vehicles and containers carrying goods, in their vicinity and during the loading and unloading of these goods.</p>	<p>Spain: Refers at least to unloading and discharging; but reference to removing is perhaps not intended.¿?</p> <p>On the other hand, applies additionally to 7.5.1, and there all three meanings are explicitly included...</p>	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
7.5.11	<p>CV21 The transport unit shall be thoroughly inspected prior to loading.</p> <p>Before carriage, the carrier shall be informed:</p> <ul style="list-style-type: none"> - about the operation of the refrigeration system, including a list of the suppliers of coolant available en route; - procedures to be followed in the event of loss of temperature control. <p>In the case of temperature control in accordance with methods R2 or R4 of special provision V8(3) of Chapter 7.2, a sufficient quantity of non-flammable refrigerant (e.g. liquid nitrogen or dry ice), including a reasonable margin for possible delays, shall be carried unless a means of replenishment is assured.</p> <p>Packages shall be so stowed as to be readily accessible.</p> <p>The specified control temperature shall be maintained during the whole transport operation, including loading and unloading, as well as any intermediate stops.</p>	Spain: Refers to all 3 meanings	
7.5.11	<p>CV25 (1) Packages shall be so stowed that they are readily accessible.</p> <p>(2) When packages are to be carried at an ambient temperature of not more than 15 °C or refrigerated, the temperature shall be maintained when unloading or during storage.</p> <p>(3) Packages shall be stored only in cool places away from sources of heat.</p>	Spain: Refers to all 3 meanings	
7.5.11	<p>CV27 (1) Packages shall be so stowed that they are readily accessible.</p> <p>(2) When packages are to be carried refrigerated, the functioning of the cooling chain shall be ensured when unloading or during storage.</p> <p>(3) Packages shall only be stored in cool places away from sources of heat.</p>	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
7.5.11	<p>CV 33</p> <p>(3) <i>Stowage during carriage and storage in transit</i></p> <p>(3.1) Consignments shall be securely stowed.</p> <p>(3.2) Provided that its average surface heat flux does not exceed 15 W/m² and that the immediately surrounding cargo is not in bags, a package or overpack may be carried or stored among packaged general cargo without any special stowage provisions except as may be specifically required by the competent authority in an applicable certificate of approval.</p> <p>(3.3) Loading of containers and accumulation of packages, overpacks and containers shall be controlled as follows:</p> <p>(a) Except under the condition of exclusive use, and for consignments of LSA-I material, the total number of packages, overpacks and containers aboard a single vehicle shall be so limited that the total sum of the transport indexes aboard the vehicle does not exceed the values shown in Table D below;</p> <p>(b) The radiation level under routine conditions of carriage shall not exceed 2 mSv/h at any point on, and 0.1 mSv/h at 2 m from, the external surface of the vehicle, except for consignments carried under exclusive use, for which the radiation limits around the vehicle are set forth in (3.5) (b) and (c);</p> <p>(c) The total sum of the criticality safety indexes in a container and aboard a vehicle shall not exceed the values shown in Table E below.</p> <p>Table D: Transport Index limits for containers and vehicles not under exclusive use</p> <p>Type of container or vehicle</p> <p>Limit on total sum of transport indexes in a container or aboard a vehicle</p> <p>Small container 50</p> <p>Large container 50</p>	Spain: Refers to all 3 meanings	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
8.2.2.3.2	<p>Subjects to be covered by the basic training course shall be, at least:</p> <ul style="list-style-type: none"> (a) General requirements governing the carriage of dangerous goods; (b) Main types of hazard; (c) Information on environmental protection in the control of the transfer of wastes; (d) Preventive and safety measures appropriate to the various types of hazard; (e) What to do after an accident (first aid, road safety, basic knowledge about the use of protective equipment, instructions in writing, etc.); (f) Marking, labelling, placarding and orange-coloured plate marking; (g) What a driver should and should not do during the carriage of dangerous goods; (h) Purpose and the method of operation of technical equipment on vehicles; (i) Prohibitions on mixed loading in the same vehicle or container; (j) Precautions to be taken during loading and unloading of dangerous goods; (k) General information concerning civil liability; (l) Information on multimodal transport operations; (m) Handling and stowage of packages; (n) Traffic restrictions in tunnels and instructions on behaviour in tunnels (prevention of incidents, safety, action in the event of fire or other emergencies, etc.); (o) Security awareness. 	Spain: Refers to all 3 meanings	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
8.2.3	<p>Training of persons other than the drivers holding a certificate in accordance with 8.2.1, involved in the carriage of dangerous goods by road</p> <p>Persons whose duties concern the carriage of dangerous goods by road shall have received training in</p> <p>the requirements governing the carriage of such goods appropriate to their responsibilities and duties</p> <p>according to Chapter 1.3. This requirement shall apply to individuals such as personnel who are employed by the road vehicle operator or the consignor, personnel who load or unload dangerous goods, personnel in freight forwarding or shipping agencies and drivers of vehicles other than drivers holding a certificate in accordance with 8.2.1, involved in the carriage of dangerous goods by road.</p>	Spain: Refers to all 3 meanings	
8.3.6	<p>Running the engine during loading or unloading</p> <p>Except where the engine has to be used to drive the pumps or other appliances for loading or unloading the vehicle and the laws of the country in which the vehicle is operating permit such use,</p> <p>the engine shall be shut off during loading and unloading operations.</p>	Spain: Refers to all 3 meanings	

Article	Text	Comments	Changes proposed
CHAPTER 8.5	S1: Requirements concerning the carriage of explosive substances and articles (Class 1) (1) <i>Special training of drivers</i>	Spain: Refers to all 3 meanings.	
ADDITIONAL REQUIREMENTS RELATING TO PARTICULAR CLASSES OR SUBSTANCES	<p>If, according to other regulations applicable in the country of a Contracting Party, a driver has followed equivalent training under a different regime or for a different purpose, covering the subjects defined in 8.2.2.3.4, the specialization training course may be totally or partially dispensed with.</p> <p>(2) <i>Approved official</i></p> <p>If the national regulations so provide, the competent authority of a country contracting party to ADR may require an approved official to be carried in the vehicle at the carrier's expense.</p> <p>(3) <i>Prohibition of smoking, fire and naked flame</i></p> <p>Smoking, the use of fire or of naked flames shall be prohibited on vehicles carrying substances and articles of Class 1, in their vicinity and during the loading and unloading of these substances and articles. This prohibition of smoking is also applicable to the use of electronic cigarettes and similar devices.</p> <p>(4) <i>Places of loading and unloading</i></p> <p>(a) Loading or unloading of substances and articles of Class 1 shall not take place in a public place in a built-up area without special permission from the competent authorities;</p> <p>(b) Loading or unloading of substances and articles of Class 1 in a public space elsewhere than in a built-up area without prior notice thereof having been given to the competent authorities shall be prohibited, unless operations are urgently necessary for reasons of safety;</p> <p>(c) If, for any reason, handling operations have to be carried out in a public place, then substances and articles of different kinds shall be separated according to the labels;</p> <p>(d) When vehicles carrying substances and articles of Class 1 are obliged to stop for loading or unloading operations in a public place, a distance of at least 50 m shall be maintained between the stationary vehicles. This distance shall not apply to vehicles belonging to the same transport unit.</p> <p>...</p> <p>(7) <i>Locking of vehicles</i></p> <p>Doors and rigid covers in the load compartments of EX/II vehicles and all openings in the load</p>	<p>For (7) only: Here removing is not meant (would not be wise to leave the doors open while removing the container). Perhaps “out of or from the cargo transport unit” should be added.</p> <p>Sweden: no change necessary, text is clear enough as it is</p>	

Article	Text	Comments	Changes proposed
	<p>S2: Additional requirements concerning the carriage of flammable liquids or gases</p> <p>(1) <i>Portable lighting apparatus</i></p> <p>The load compartment of closed vehicles carrying liquids having a flash-point of not more than 60 °C or flammable substances or articles of Class 2, shall not be entered by persons carrying portable lighting apparatus other than those so designed and constructed that they cannot ignite any flammable vapours or gases which may have penetrated into the interior of the vehicle.</p> <p>(2) <i>Operation of combustion heaters during loading or unloading</i></p> <p>The operation of combustion heaters of vehicles of type FL (see Part 9) is forbidden during loading and unloading and at loading sites.</p> <p>(3) <i>Precautions against electrostatic charges</i></p> <p>In the case of vehicles of type FL (see Part 9), a good electrical connection from the vehicle chassis to earth shall be established before tanks are filled or emptied. In addition, the rate of filling shall be limited.</p>	<p>Spain: Refers to all 3 meanings</p>	
	<p>S15: The provisions of Chapter 8.4 concerning the supervision of vehicles shall apply for vehicles carrying</p> <p>any amount of these substances. However, the provisions of Chapter 8.4 need not be applied when the</p> <p>loaded compartment is locked or the packages carried are otherwise protected against any illicit unloading.</p>	<p>Spain: Refers to all 3 meanings</p>	

<i>Article</i>	<i>Text</i>	<i>Comments</i>	<i>Changes proposed</i>
	<p>S21: The provisions of Chapter 8.4 concerning the supervision of vehicles shall apply to all material, in whatever mass. In addition, these goods shall be subject at all times to supervision to prevent any malicious act and to alert the driver and the competent authorities in the event of loss or fire. However, the provisions of Chapter 8.4 need not be applied where:</p> <p>(a) The loaded compartment is locked or the packages carried are otherwise protected against illicit unloading; and</p> <p>(b) The dose rate does not exceed 5 μSv/h at any accessible point on the outer surface of the vehicle.</p>	Spain: Refers to all 3 meanings	