

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

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Item 6 b) of the provisional agenda

**Proposals for amendments to Annexes A and B of ADR:  
miscellaneous proposals**

### **Comments on 2016/3 – Draft proposal to amend sub-sections 1.1.3.6.4 and 5.4.1.1.1 (f)**

#### **Transmitted by the Government of Sweden**

Sweden supports the principle in IRU's proposal. Several years ago, the note in 5.4.1.1.1 (g) actually required the value to be indicated ("**NOTE: In the case of application of 1.1.3.6 the total quantity of dangerous goods carried per transport unit shall be expressed as a value calculated in accordance with the provisions of 1.1.3.6.**"). This requirement was removed in ADR 2003.

Since a carrier might pick up goods from several consignors, the value should always be indicated in the document irrespective of whether the goods belong to the same transport category or not. Document 2016/3 from IRU proposes to amend the note in sub-section 5.4.1.1.1 (f) which seems reasonable. However, since this note refers to calculated values of 1.1.3.6.4 – which deals with dangerous goods of different transport categories – it might be understood that the value is not required when the goods belong to the same transport category.

For this reason, we would suggest an alternative solution to IRU's proposal. The proposed changes are based on the current texts in ADR.

#### **Proposal 1:**

Amend 1.1.3.6.4 as follows (changes stricken out or underlined):

1.1.3.6.4 ~~Where~~When dangerous goods ~~of different transport categories~~ are carried in the same transport unit, the sum of:

- The quantity of substances and articles of transport category 1 multiplied by "50";
- The quantity of substances and articles of transport category 1 referred to in Note a to the table in 1.1.3.6.3 multiplied by "20";
- The quantity of substances and articles of transport category 2 multiplied by "3"; and
- The quantity of substances and articles of transport category 3;

shall not exceed a calculated value of 1000 "~~1 000~~".

#### **Proposal 2:**

Amend 5.4.1.1.1 (f), NOTE 1, as follows (changes underlined or stricken out):

NOTE 1: In the case of intended application of 1.1.3.6, the total quantity and calculated value of dangerous goods for each transport category shall be indicated in the transport document ~~in accordance with 1.1.3.6.3~~ (see 1.1.3.6.3 and 1.1.3.6.4).”

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