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INLAND TRANSPORT COMMITTEE

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Item 5 (a) of the provisional agenda

Supervision of vehicles

Comments on document ECE/TRANS/WP.15/192/Add.1

Transmitted by the Government of Switzerland

SUMMARY

Executive Summary: Assign appropriate quantities limits concerning supervision in chapter 8.5 S1 (6)

Action to be taken:

Related documents: ECE/TRANS/WP.15/192/Add.1

**1. Introduction**

Considering the limits laid down for the supervision of vehicles in the report ECE/TRANS/WP.15/192/Add.1 of the May session of WP.15 for Chapter 8.5 S1 (6), it can be said that the target of bringing them in accordance with the rules of security is not achieved. From one hand the report still contains some square brackets which need to be addressed. On the other hand some adopted texts should be revised because of the inconsistency with the actually existing security rules. In some cases the security rules apply but the supervision rules do not apply and in other cases the supervision of the vehicle apply but the security provisions don't apply.

**2. Square brackets which need to be addressed.**

In chapter 8.5 S1 (6) the limits assigned to division 1.3, other than compatibility group C, Division 1.4 and Division 1.6 should be defined.

In order to find a coherent limit between supervision and security rules some facts should be considered first:

Following 1.10.4, the security provisions of chapter 1.10 only apply over the limits laid down in 1.1.3.6.3. Although until now, when considering the supervision rules, there was no need to take in consideration the limits of 1.1.3.6.3 because the limits in chapter 8.5 were in many cases by far above those of paragraph 1.3.6.3, this will no more be the case with some of the new adopted limits.

### **Division 1.3**

For Division 1.3, other than compatibility group C the limit 50 kg is proposed in the report.

Looking to the limits for Division 1.3 in 1.1.3.6.3, one observes the following different cases:

1° Compatibility group L has an upper limit of 0 kg meaning that the security provisions of chapter 1.10 shall apply over 0 kg.

2° Compatibility group G, H J have an upper limit of 20 kg meaning that the security provisions of chapter 1.10 shall apply over 20 kg.

In conclusion in order to maintain a coherence between the supervision rules and the security rules for Division 1.3 a distinction between the two cases should be considered when assigning a limit for supervision of vehicles.

For compatibility group L the limit 0 shall apply. This case will be discussed later.

For compatibility groups G, H, J the limit should be 20 kg.

### **Proposal 1**

In S1( 6), for "Division 1.3, other than compatibility group C" replace "[50]" by "20".

### **Division 1.4**

The same problems are arising in this case. Bearing in mind the limits of applicability of the security rules, that is the limits of 1.1.3.6.3, and in order to bring the supervision limits in accordance with them, the following shall be considered.

### **Proposal 2**

In S1( 6), for "Division 1.4 " replace "[50]" by "333".

### **Division 1.6**

For the same reasons as before the limit for Division 1.6 shall be put at 333 kg in order to maintain a consistency between supervision and security rules.

### **Proposal 3**

In S1( 6), for "Division 1.6 " replace "[50]" by "333".

### 3. Other changes to be considered

#### **Divisions 1.1 and 1.2**

Looking at the compatibility between security rules and supervision rules and bearing in mind the limits of application of security rules laid down in 1.1.3.6.3, a distinction needs to be made between compatibility groups A, L and B to J.

Compatibility groups A and L are subject to security rules starting from 0 kg.

Compatibility groups B to J are subject to security rules starting from 20 kg.

In order to give to the supervision of the vehicle the same applicability as the security rules the following proposals shall be adopted:

#### **Proposal 4**

In S1( 6),

For Divisions 1.1 and 1.2 add before ":", the text ",compatibility groups A and L" (2x).

After Division 1.1 add a new row with the following text:

"Division 1.1, other than compatibility groups A and L: 20 kg"

After Division 1.2 add a new row with the following text:

"Division 1.2, other than compatibility groups A and L: 20 kg"

#### **Division 1.3**

The adopted limit of 0 kg for Division 1.3, compatibility group C introduces an inconsistency in the existing system of security rules because actually the security rules apply only over the limit of 20 kg following the limits of 1.1.3.6.3. As mentioned above it should be distinguished between compatibility group L and the other cases and by putting Division 1.3, compatibility group C at the same limit as the other compatibility groups: that is 20 kg.

#### **Proposal 5**

In S1 (6), by Division 1.3, compatibility group C:..." replace "compatibility group C" by "compatibility group L

#### **Proposal 6**

In S1 (6), for "Division 1.3, other than compatibility group C" replace " other than compatibility group C" by ", other than compatibility group L".

### **Division 1.4**

Bearing in mind the limits of applicability of the security rules, that is the limits of 1.1.3.6.3 and in order to bring the supervision limits in accordance with them the following shall be considered.

1° Comptatibility group L has an upper limit of 0 kg in 1.1.3.6.3 meaning that the security provisions of chapter 1.10 shall apply over 0 kg.

2° Compatibility group B to G have an upper limit of 333 kg in 1.1.3.6.3 meaning that the security provisions of chapter 1.10 shall apply over 333 kg only.

In conclusion in order to maintain a coherence between the supervision rules and the security rules for Division 1.4 a distinction between the two cases should be considered when assigning a limit for supervision of vehicles.

For compatibility group L the limit 0 shall apply.

For compatibility groups B to G the limit should be 333 kg.

### **Proposal 7**

In S1 (6), add a new row before "Division 1.4..." with the following text:

"Division 1.4, compatibility group L: 0 kg"

### **Proposal 8**

In S1( 6), by "Division 1.4 " add ", other than compatilbity group L".

### **Division 1.5**

The assginment of the limit 0 kg regarding supervision provision for Division 1.5 introduces an inconsistency because the security rules only apply over the quantity of 20 kg..

Until now the limit for the superviyion in the case of 1.5D was 50 kg. In order to maintain a certain coherence between the applicabiltiy of the security rules and the supervision rules we propose to adapt the limit at 20 kg for Division 1.5.

### **Proposal 9**

In S1( 6), for Division 1.5 replace "0 kg " by "20 kg".

### **Summary**

If these changes would be adopted the text will have the following aspect:

Division 1.1, compatibility groups A and L: 0 kg

Division 1.1, other than compatibility groups A and L:	20 kg
Division 1.2, compatibility groups A and L:	0 kg
Division 1.1, other than compatibility groups A and L:	20 kg
Division 1.3, compatibility group L:	0 kg
Division 1.3, other than compatibility group L:	20 kg
Division 1.4, compatibility group L:	0 kg
Division 1.4:other than compatibility group L	333 kg
Division 1.5:	20 kg
Division 1.6:	333 kg
Substances and articles belonging to UN numbers 0104, 0237,0255, 0267, 0289, 0361, 0365, 0366, 0440, 0441, 0455, 0456 and 0500:	0 kg".

### **Remarks**

This solution could seem complicated at a first glance. But in fact we only restore the actual existing situation and render compatible the security and supervision rules which was the target of the starting proposals. In doing so the users won't have any surprise when applying security rules and supervision rules. In trying to adapt the limits of Chapter 8.5 S1 (6) to those applying to chapter 1.10 (that is, those of 1.1.3.6.3), we have tried to eliminate some of the incompatibilities which the new limits have introduced. By doing so we hope that the user will not be confronted to illogical situations where for example supervision of the vehicle is required but no security provisions, or in the contrary, security provisions are required and no supervision of the vehicle is required. This kind of illogica situations and inconsistencies should be avoided and our proposals are going in this direction.

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