

## Economic Commission for Europe

### Inland Transport Committee

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

Joint Meeting of the RID Committee of Experts and the

Working Party on the Transport of Dangerous Goods

Bern, 20-24 March 2023

Item 5 (b) of the provisional agenda

Interpretation of RID/ADR/ADN

16 March 2023

## **Requirements, concerning documentation, not explicitly listed in 5.4 - complements to document ECE/TRANS/WP.15/AC.1/2023/15**

Transmitted by the Government of France

### Introduction

1. Document ECE/TRANS/WP.15/AC.1/2023/15 points out the problems linked to the fact that many provisions concerning dangerous goods information in transport is not totally covered in chapter 5.4. This is the case for information required through special provisions. And the proposal in ECE/TRANS/WP.15/AC.1/2023/15 aims at solving that issue.
2. However, this issue has been identified during meetings concerning eFTI last year and the fact that an amendment to RID/ADR/ADN 2023 introduces a similar requirement in 5.4.1.1.21 has been overlooked. But further comments on our document have also mentioned that additional information in the transport document that do not appear in 5.4 are also mentioned in chapters 3.5, 4.1, 4.2, 4.3, and 5.5. Thus, even the new 5.4.1.1.21 doesn't not fully cover the cases where additional information is required. Therefore, we propose to substitute the initial proposal in ECE/TRANS/WP.15/AC.1/2023/15 with proposal 1 below, offering two options.
3. Furthermore, during later discussions concerning the completion of transport information specific to dangerous goods, other issues have appeared.
4. In the TDG regulations a link is clearly made between the information in the transport document and the vehicle/wagon/vessel carrying the goods, in 8.1.2.1 (a) of ADR, 8.1.2.1 (b) of ADN and 1.4.3.6 (b) of RID.
5. When using material paper document this link is automatically ensured by the presence of the documents on board and it has never been necessary to specify it in chapter 5.4 where the prescriptions on documentation are defined.
6. When using dematerialized procedures for sending the transport information this link is not ensured by "material construction" anymore. So, it needs to be clearly stated in the regulations; especially now where dematerialized systems are developed for transport in general but include dangerous goods also by developers that are not experts in dangerous goods. This is fundamental improvement permitted by electronic data exchange and is very important for safety in the case of an emergency response situation were the responder need to get the information from a distance
7. This is a problem only in the case of the use of electronic information. To clarify this issue, we propose to add some text at the end of 5.4.0.2 as provided in proposal 2 below.
8. The Joint Meeting is invited to comment as appropriate and decide which of the proposals could be adopted. We are conscious that, although relating to an official document, these modifications are produced in a late paper. Based on the comments received we could come back at the September session, if necessary.

## **Proposal 1**

### **Option 1**

In 5.4.1.1.1 add a new item (I) to read as follows:

“(I) A declaration in accordance with the requirements of any additional provision concerning documentation of Chapters 3.3, 3.5, 4.1, 4.2, 4.3, and 5.5 when applicable”.

As a consequential amendment, mark 5.4.1.1.21 as “reserved”.

### **Option 2**

Modify 5.4.1.1.21 to read as follows:

**“5.4.1.1.21 Additionnal information required in the case specific situations defined in other parts of these regulations**

Where in accordance with provisions in chapters 3.3, 3.5, 4.1, 4.2, 4.3, and 5.5 additionnal information is necessary relating to specific situations, this additionnal information shall be included in the transport document as appropriate.”.

## **Proposal 2**

At the end of 5.4.0.2 add the following sentence:

“When electronic data processing is used data concerning the identification of the [vehicle/wagon/vessel] carrying the dangerous goods, such as a registration number, shall be part of the information sent with the transport documentation, in order to allow a link between information concerning the dangerous goods and the [vehicle/wagon/vessel] in case of a remote consultation of the transport documentation.”

## **Annex**

After checking throughout the regulations with the search function, the following places have been identified, where additional information is required and that are not yet listed in 5.4:

### **Chapter 3.5**

3.5.6

### **Chapter 4.1**

P099, P101, P200 (10) ta, IBC099, LP099, 4.1.8.7 and 4.3.2.3.7

### **Chapter 5.5**

5.5.2.4 and 5.5.3.7.2

If some other cases would be identified that we might have forgotten, France would be happy to include them in the proposals.

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