

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

15 March 2023

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:

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

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 on 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 years and the fact that an amendment to RID/ADR/ADN 2023 introduces a similar requirement in 5.4.1.1.21 has been overlooked. The Joint Meeting might nevertheless consider if the proposal in ECE/TRANS/WP.15/AC.1/2023/15 makes it clearer and, in that case, delete 5.4.1.1.21 as a consequential amendment or leave the text as it currently is in the 2023 publication.
3. Furthermore, during later discussions on 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 distance.
7. To clarify this issue, we propose to add some text at the end of 5.4.0.2 as provide in the proposal below.
8. The Joint Meeting is invited to comment as appropriate. We are conscious that this is a late information document. Based on the comments received France could come back at the September session, if necessary.

Proposal

9. At the end of 5.4.0.2 add the following sentence to read:

“When electronic data processing is used data on 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, to allow a link between the information on the dangerous goods and the [vehicle/wagon/vessel] in the case of a remote consultation of the transport documentation.”
