

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 6 of the provisional agenda

Interpretation of ADR

Interpretation of machinery and equipment in relation to 1.1.3.6.3 first indent.

Transmitted by the International Association of Dangerous Goods Safety Advisers (IASA)

Introduction

1. In ADR 2007 the wording of 1.1.3.6.3 first indent, last paragraph was changed, to allow calculations according to 1.1.3.6 for machinery and equipment being based on the actual quantity of dangerous goods contained therein.

2. The present text reads:

“For articles, total mass in kilograms of the articles without their packagings (for articles of Class 1, net mass in kilograms of the explosive substance; for dangerous goods in machinery and equipment specified in this Annex, the total quantity of dangerous goods contained therein in kilograms or litres as appropriate)”

3. The underlined text, is the subject of further interpretation.

4. The amended text was a result of a series of documents initially introduced by Norway. The final proposal from Norway was presented in document <https://unece.org/DAM/trans/doc/2007/wp15ac1/ECE-TRANS-WP15-AC1-2007-24e.pdf>.

5. The document was adapted – see item 89. in the report of the September meeting 2007. <https://unece.org/DAM/trans/doc/2007/wp15ac1/ECE-TRANS-WP15-AC1-108e.pdf>.

6. In the proposal from Norway, a series of entries from table A was outlined as the new wording may apply for those. These entries were:

UN 2857 Refrigerating machines; UN 2990 Life-saving appliances, self-inflating; UN 3072 Life-saving appliances, not self-inflating; UN 3091 Lithium batteries contained in equipment; UN 3268 Air bag modules; UN 3316 First aid kit; UN 3358 Refrigerating machines; UN 3476 Fuel cell cartridge contained in equipment; UN 3477 Fuel cell cartridge contained in equipment.

7. The need for interpretation arises, since it seems that interpretation by authorities in the different member countries are not uniform.

Question 1

8. IASA would like to submit the following interpretation questions for consideration by the Working Party:

Should the calculation for the above types of machinery and equipment to be based on the quantity of dangerous good within the machinery and equipment, or the calculation should be based on the weight of the entire piece of equipment or machinery?

Example:

9. Based on the reply to question 1, what is the correct quantity to be considered, for a life raft classified under UN2990 Life-Saving-appliances, self-inflating, it has a weight of 1080 kg. It contains among others compressed gas, pyrotechnics, matches, first aid kit and batteries. The weight of the dangerous goods within the raft is 122 kg.

10. Should the calculation according to 1.1.3.6 be based on the 1080 kg or the 122 kg?

Question 2:

11. In general, how to distinguish between, what in table A (or Annex A) is regarded as an article and what is regarded machinery or equipment.
