

**Economic Commission for Europe**  
**Inland Transport Committee**  
**Working Party on the Transport of Dangerous Goods**

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Item 4 of the provisional agenda

Work of the RID/ADR/ADN Joint Meeting

**Comments on INF.7 (Texts adopted by the Joint Meeting: amendments to ADR for entry into force on 1 January 2025)**

**Transmitted by the Government of Finland**

**Introduction**

1. The document ECE/TRANS/WP.15/AC.1/2023/15 (France) and INF.36/Rev.1 (France) were discussed at the last joint meeting (WP.15/AC.1) in Bern in March 2023. There was desire to compile all information on cargo data in Chapter 5.4. This is partly due to the facilitation of the introduction of electronic transport documents. There was also need to ensure a clear link between the information in the transport document and the vehicle/wagon/vessel carrying the goods,

2. The Joint Meeting considered the documents and adopted the amendments proposed in informal document INF.43 with additional modifications. The additional sentence to 5.4.0.1 were kept in square brackets. The amendment to 5.4.0.1 is as follows (new text underlined):

5.4.0.1 Unless otherwise specified, any carriage of goods governed by ADR shall be accompanied by the documentation prescribed in this Chapter, as appropriate. [The information prescribed in this Chapter related to the dangerous goods carried shall be available during carriage in such a way that the goods per wagon/vehicle/vessel and the wagon/vehicle/vessel which is carrying them can be identified in the documentation.].

**Transport document in ADR**

3. The above-mentioned amendment was kept in square brackets to be checked for ADR in WP.15.

4. In ADR 1.4.2.1 (b) and 1.4.2.2.1 (b), there are requirements on information and data related to the dangerous goods to be carried (obligations of consignor and carrier). ADR 8.1.2.1 includes requirements on documents to be carried on the transport unit. It seems that there is no need to amend them.

5. Additionally, the requirement 5.4.1.4.2 applies to the information in the transport unit on the substances to be transported. The requirement appears to be formulated on the basis that the transport document is per transport unit rather than per vehicle. In order to take account of the above-mentioned joint meeting decision, paragraph 5.4.1.4.2 could be clarified. In order to achieve this, these options could be considered:

- **Option 1:** The first paragraph of 5.4.1.4.2 - no amendment:

If by reason of the size of the load, a consignment cannot be loaded in its entirety on a single transport unit, at least as many separate documents, or copies of the single document, shall be made out as transport units loaded. Furthermore, in all cases, separate transport documents shall be made out for consignments or parts of

consignments which may not be loaded together on the same vehicle by reason of the prohibitions set forth in 7.5.2.

Justification: In this option, the interpretation could be that the prepared documentations are accepted but anyhow during the carriage the new 5.4.0.1 applies: In roadside control, the goods carried can be verified (the goods per vehicle) based on 5.4.0.1.

- **Option 2:** The first paragraph of 5.4.1.4.2 - amend as follows:

If by reason of the size of the load, a consignment cannot be loaded in its entirety on a single transport unit, at least as many separate documents, ~~or copies of the single document, identifying the goods in the transport unit,~~ shall be made out as transport units loaded. Furthermore, in all cases, separate transport documents shall be made out for consignments or parts of consignments which may not be loaded together on the same vehicle by reason of the prohibitions set forth in 7.5.2.

Justification: In this option, it has been specified that the document is prepared in such a way that each document corresponds to the goods carried in the unit in question. But anyhow, according to the new 5.4.0.1, more specifically during carriage in roadside control the goods carried can be verified (the goods per vehicle).

- **Option 3:** In the first paragraph of 5.4.1.4.2 - delete the first sentence:

If by reason of the size of the load, a consignment cannot be loaded in its entirety on a single transport unit, at least as many separate documents, or copies of the single document, shall be made out as transport units loaded. Furthermore, in all cases, A separate transport documents shall be made out for consignments or parts of consignments which may not be loaded together on the same vehicle by reason of the prohibitions set forth in 7.5.2.

Justification: This corresponds to what is already in RID.

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