
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

114th session

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Item 5 (b) of the provisional agenda

Proposals for amendments to annexes A and B of ADR:

miscellaneous proposals

13 October 2023

Amendment to 7.5.7.5/8.3.3 of ADR

Transmitted by the Government of the Netherlands

Introduction

1. Members of the vehicle crew may not open a package containing dangerous goods according to 7.5.7.5 or 8.3.3 of ADR. In the Netherlands this prohibition creates serious problems for retail distribution in a local distribution chain from a local distribution depot to a retailer or end-user and from the retailer to the end-user.
2. That is particularly the case for open an outer packaging containing dangerous substances applied as pesticides and an IBC carrying UN1202, diesel oil, gas oil or light fuel oil. This opening of the outer packaging by the vehicle crew is only necessary for the direct delivery of said substances in agricultural and road construction as well as on construction sites.
3. In order to allow these operations to be justified, it is proposed to clarify the current provisions in ADR to allow competent authorities of Contracting Parties to authorize certain operations on their territory.

Proposal

4. In 7.5.7.5 and 8.3.3 introduce a note under the provision to read (new text is underlined):

“NOTE: The competent authorities of the Contracting Parties may provide that this provision shall not apply to certain [handling operations] [handling activities] which are authorized by the competent authorities.”

Justification

5. The aim of this document is to clarify the application and the scope of 7.5.7.5 or 8.3.3 of ADR. It is felt that adding this note proposed above helps the understanding of these provisions in ADR. It also reduces unnecessary administrative and regulatory burdens and is within the scope of United Nations Sustainable Development Goal 11 (Sustainable Transport).
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