

## Economic Commission for Europe

### Inland Transport Committee

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

114th session

3 November 2023

Geneva, 6-10 November 2023

Item 6 of the provisional agenda

Interpretation of ADR

### Transport document and related information - goods of each transport unit

#### Transmitted by the Government of Finland

#### I. Introduction

1. In the recent meetings of WP.15 and the joint meeting, transport document have been discussed. Amendments have been adopted related to electronically transmitted dangerous goods data. Finland agrees with the amendments adopted in the September 2023 session of the joint meeting (amendments in 5.4.0 apply only to the electronic transport documents).
2. Finland still has concerns presented in the doc. 2023/6 of WP.15 May meeting related to 5.4.1.4.2. Generally, it should be understood that the documentation on a transport unit corresponds to the dangerous goods carried on that transport unit. However, this is not clearly required.
3. According to 5.4.1.4.2, it seems that if a load consisting of several packages needs to be divided for carriage on different transport units it is sufficient that a copy of the single document covering the whole load is on each transport unit without specifying which goods are on each transport unit. Separate transport documents are required for each vehicle only in the case of prohibition on mixed loading.

#### II. Interpretation

3. Finland would like to know the opinion of the working party what is meant by the first sentence of the first paragraph of 5.4.1.4.2 (underlined). Is it permissible to use the same document for the whole load which is divided into different transport units without specifying what is carried in each transport unit ("copies of the single document" in every transport unit)?

"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. "

4. If the answer is *no* to the question in paragraph 3, the text could be clarified. Finland could propose the following amendments and, if necessary, make a formal proposal on which it wishes to hear views.

**(a) Option 1:** 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 each document corresponds to the goods carried in the unit in question.

**(b) Option 2:** 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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