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INLAND TRANSPORT COMMITTEE

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

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PROPOSALS OF AMENDMENTS TO ANNEXES A AND B OF ADR

Part 7 of ADR

Chapter 7.2 - Provisions concerning carriage in packages

Transmitted by the Government of Norway

SUMMARY

Executive Summary:	Provision "V7" of 7.2.4 gives rise to problems of interpretation, practical problems for the transport operators, as well as disharmony with the IMDG code.
Action to be taken:	Change the text provision "V7" into an operational requirement instead of the present technical requirement for the construction of vehicles and containers.
Related documents:	Restructured ADR; TRANS/WP.15/159/Add.10.

Introduction

Provision "V7" of 7.2.4 requires closed vehicles and closed containers carrying gases to "be provided with adequate ventilation". This requirement creates problems both by its rather general way of stating a requirement and in practice when trying to fulfil the requirement.

Firstly, one is not able to set a sensible minimum requirement for such "adequate ventilation", which leaves it open to interpretation by anyone involved, including control personnel on the road. Secondly, many transport operators are not willing to modify their containers and swap bodies to cope with such a requirement. This unwillingness is based mainly on the fact that under Nordic climate, having openings in the containers and swap bodies will restrict the types of cargo that can be transported in them due to temperature restrictions for the cargo. In Norway, this had lead to a situation where it has become extremely difficult to transport gases in cylinders.

Furthermore, no such requirement exists in the IMDG code, and in a country with lots of combined land/coastal transport, such special, technical requirements for multimodal transport equipment creates problems.

Proposal

Change the wording of “V7” to read:

“If packages are carried in a closed vehicle or in a closed container, the doors shall be left open for at least 3 minutes before entering”.

Justification

The content of the existing “V7” is not a provision concerning the safety in transport as such, but is directed towards worker safety in the unloading operation. This is outside of the scope of the ADR, but Norway nevertheless have sympathy for the reasoning behind putting requirements to this effect into the regulations when they are so closely linked to the transport operation. As mentioned above the present text creates too many problems in practice and should be changed so that the intention of the provision is kept, but in a manner that will not create problems for the transport operation.

Safety implications

The proposed change will not lower the safety level of the transport of gases.

Feasibility

The proposed change will remove an obstacle for transport operators and thus facilitate the transport operations.

Enforceability

The expert from Norway sees no problems in enforceability arising from the proposal. On the contrary, it will solve a problem for the competent authorities and control authorities that will no longer be faced with various interpretations of “adequate ventilation”.
