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of Dangerous Goods

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PART 5 OF ADR

Chapter 5.4: Documentation

Transmitted by the Government of Norway

SUMMARY

Executive Summary:	The use of reference to label numbers in the transport document [5.4.1.1.1 (c), third indent] and to Class in the instructions in writing [5.4.3.1 (a)] has been reported to cause problems for the transport industry, both in electronic issuance of the documents and at roadside controls.
Action to be taken:	Change the requirement in 5.4.3.1(a) from referring only to Class to referring to label numbers.
Related documents:	TRANS/WP.15/174/Add. 1

Introduction

The reference to label numbers in the transport document [5.4.1.1.1 (c)] and to the Class in the instructions in writing [5.4.3.1 (a)] has been reported to cause problems for the transport industry, both in electronic issuance of the documents and at roadside controls.

Furthermore, the present text of 5.4.3.1 (a) does not take into account the fact that both Class 1 and Class 2 have labels corresponding to divisions comprising different dangers, and the fact that there may be dangers of more than one Class.

Proposal

Change the wording of 5.4.3.1 (a) to read:

- “(a) - the proper shipping name of the substance or article or name of the group of goods;
- the label model number given in column (5) of Table A in chapter 3.2, or for a group of goods, the label model numbers. When more than one label model number are given, the numbers following the first one shall be given in brackets.

For substances and articles of Class 1: the classification code given in Column 3(b) of Table A in Chapter 3.2. When in Column (5) of Table A of Chapter 3.2, label model numbers other than 1, 1.4, 1.5 and 1.6 are given, these label numbers, in brackets, shall follow the classification code; and

- the UN number, or for a group of goods the UN numbers.”

Justification

The Norwegian competent authority for ADR has been made aware of problems within the transport industry regarding the use of different references in the provisions for the texts in the transport document and in the instructions in writing to the driver. These problems are both in connection with the use of electronic means of setting up the documents and when vehicles are stopped at roadside controls and the control authorities find what they consider to be inconsistencies between the two documents.

Both in Class 1 and in Class 2 there is more than one label, corresponding to the actual danger of the specific substance or article within the Class, and whose information is lost in the introductory text of the instructions in writing. Furthermore, there is no reference to the fact that one and the same substance or article may have dangers of more than one Class. This information is, in the present text, not available to the driver until he has read the full text.

Since the reference to the label number in the transport documents is a great help for the driver to correctly placard or label his vehicle, Norway has chosen to propose a change to the text of the written instructions so that it corresponds with that which the driver finds in the transport document.

Safety implications

Norway can see no negative safety implications. On the contrary, consistency within the documentation will lead to less chance of drivers, control personnel and others, acting upon the information given, making mistakes, and thus lead to higher safety. It will also facilitate the awareness of the driver to the all the dangers associated with his cargo.

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.
