

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
(Seventy-eight session, agenda item 6,
Geneva, 9-13 May 2005)

NEW PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Section 5.4.3

Belgian comments to document TRANS/WP.15/2005/5

Belgium cannot agree with the Italian proposal included in document TRANS/WP.15/2005/5 for the following reasons :

1. There is no real contradiction between 5.4.3.1 (a) and 5.4.3.7 :

- 5.4.3.1 (a) allows the use of one instruction for several dangerous goods (with different UN-numbers) if they all present the same danger or combination of dangers ; the instruction has to mention the UN-numbers, etc. of all of these goods (presenting the same danger or combination of dangers) that are carried;
- 5.4.3.7 allows an additional simplification : when packaged dangerous goods presenting different dangers or combinations of dangers are carried, then one instruction per class is sufficient.

The two paragraphs only lead to a different result in the case when dangerous goods with different UN-numbers are carried, all of which present the same danger or combination of dangers. Then, an “anonymous” instruction for the class to which all of these substances belong is not allowed. Belgium is of the opinion that there are no valid reasons to change this situation, meaning that 5.4.3.7 is not to be deleted.

2. Italy states “that it is not clear what must be intended for goods presenting the same dangers”. However, the dangers that have to be taken into account are listed with some precision in 5.4.3.8 under the heading “NATURE OF DANGER”. They include possible delayed effects and behaviour under fire or heating, that are not covered by the classification code. Disregarding this effect and behaviour could create unsafe situations for the emergency services under accident conditions. The classification code clearly is not a sufficient parameter to define “goods presenting the same dangers”.
