



**Economic and Social
Council**

Distr.
GENERAL

ECE/TRANS/WP.15/2006/5
17 January 2006

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
(Eightieth session, Geneva, 8-12 May 2006)

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Instructions in writing for dangerous goods carried in accordance with 1.1.3.6

Transmitted by the Government of Liechtenstein

Proposal

1.1.3.6.2

Delete the third indent.

“- Section 5.4.3 (Instructions in writing)“.

- In the current sixth indent, replace “8.1.2.1 (a) and (c)” with “8.1.2.1 (a), (b) and (c)”, and insert: “8.1.5 (c)”, after “8.1.4.5.”.

Justification

The driver of a lorry carrying packages is very often confronted with the fact that when carrying goods in accordance with 1.1.3.6, he has suddenly to mark the transport unit with orange coloured plates because he exceeds the limits as prescribed in section 1.1.3.6.3. Since “Instructions in writing” are not required when sub-section 1.1.3.6. is applied, they are not available on board the transport unit and this creates problems for the driver. The driver depends in these cases on the goodwill of the consignor. There are, of course, cases where the driver receives “Instructions in writing” but experience has shown that this rather rarely happens.

The problem occurs, in particular, when a driver collects packaged goods at a railway station. If the consignor/loader applies the exemption as per 1.1.3.6.2 and does not attach

instructions in writing to the transport documents, the driver who collects the goods at the railway station from various consignors has not been provided with the relevant instructions, and if the consolidated load of the various consignments exceeds the limits of table 1.1.3.6.3, carrying this load without instructions in writing would mean infringing the law. The goods transported are and remain dangerous goods as defined by the ADR.

The Government of Liechtenstein questions what the difference between the two situations is: the dangers of the goods remain the same, only the quantity carried is different. The instructions in writing are an important factor in relation to the safety of the vehicle crew. They must obtain the relevant information regarding the goods and the dangers in order to take the right decisions at the right moment.

Conclusion

With the inclusion of “Instructions in writing” into the new text of sub-section 1.1.3.6.2, the Working Party can protect the driver from any problems in connection with these transports and can also increase the safety of the vehicle crew in future.

The Government of Liechtenstein invited the Working Party to support and approve this proposal.
