

INLAND TRANSPORT COMMITTEE

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern, 20-23 March 2006)

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN**Comments on ECE/TRANS/WP.15/AC.1/2006/12 (France)****Marking of vehicles carrying dangerous goods in limited quantities (Chapter 3.4)****Transmitted by the International Association of the Soap, Detergent and Maintenance
Products Industry (AISE)****1. INTRODUCTION**

AISE has noted the proposals by the expert from France in ECE/TRANS/WP.15/AC.1/2006/12 concerning the marking of vehicles carrying dangerous goods in Limited Quantities in loads over 12 tonnes and the associated requirement for simplified documentation. AISE further noted that the justification for this change was based on the report published in 2002 by Inéris under the reference UN/SCETDG/21/INF.28.

AISE has also noted INF.23 transmitted by the expert of the United Kingdom which demonstrates that the INERIS report was based on a false premise – Limited Quantities have always been regulated under ADR Chapter 3.4 on the basis of a reduced risk, not on no risk. This paper further confirms that there is no evidence that, where dangerous goods have been involved in external fires, Limited Quantities packages have performed differently. The report is a theoretical desk study centred on conditions experienced in storage, not in transport, and makes no assessment of risk.

2. COMMENTS

AISE supports the position taken by the expert of the United Kingdom in stating that the INERIS report provides no justification for making changes to the current arrangements for the regulation of the transport of Limited Quantities. Our members have had no road traffic accidents caused or made worse by carrying dangerous goods in Limited Quantities. Indeed the experience of a very serious fatal accident in Germany in December 2005 showed that the only spillage requiring a clean up was from the diesel fuel from the vehicle.

Further we must express major concerns about the practical implications of the French proposal to introduce vehicle marking and documentation only for loads above a threshold of 12 tonnes. In order to ensure that loads did not exceed 12 tonnes, carriers would have to require documentation for every individual LQ package. They would have no other way of demonstrating to a roadside inspector that the load was below the limit.

However, general and parcels carriers utilise standard electronic/bar coded tracking systems that have no facility for adding data about dangerous goods. They can carry Limited Quantities packages, as no additional data is necessary. If additional LQ paperwork were to be required, carriers have confirmed that they would stop carrying such goods in the same way that they currently refuse to carry dangerous goods in larger pack sizes that would require load calculations to meet the 1.1.3.6 provisions. AISE members are reliant on such general carriers for the distribution of their products to many of their retailers and end users.

If the proposed changes were implemented, AISE members would have to resort to the use of either their own transport or carriers specialising in such traffic, perhaps by using small vehicles that could not carry

more than 12 tonnes. These changes would lead to dead mileage as vehicles return empty and/or inefficient use of road capacity and fuel. This would create unnecessary environmental damage as well as increased costs.

Practical experience over many years shows that there have been no safety problems created by the transport of Limited Quantities packaging and the current marking of cartons and shrink wrap trays with the UN number in a diamond has provided sufficient information to the emergency services in the case of traffic accidents.

The cost of equipping vehicles in the general carrier fleet with foldable 'LQ' placards would be very significant.

3. CONCLUSION

There is no safety or cost/benefit justification for changing the existing regulatory arrangements in Chapter 3.4. The proposals would also create significant enforcement problems. AISE therefore urge the Joint Meeting to reject the proposals set out in ECE/TRANS/WP.15/AC.1/2006/12.
