

**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods

Bern, 26-30 March 2007

**REPORTS OF INFORMAL WORKING GROUPS**

**Report of the Working Group on Limited Quantities  
held in Paris, 7-8 February 2007**

**Transmitted by the Government of France on behalf of the Working Group**

**Introduction**

1. The Working Group held its meeting in Paris from 7 to 8 February 2007. The meeting was attended by representatives from the following countries and organizations: Belgium, France, Germany, Latvia, Norway, Sweden, Switzerland, Netherlands, the United Kingdom, the European Commission, AISE, CEPE, FEA, FIATA, IRU.

2. The Working Group followed the mandate given by the Joint Meeting in the report on the session in Bern 20-23 March 2006 (ECE/TRANS/WP.15/AC.1/102), paragraph 46 :

“The Joint Meeting agreed that in the light of the discussions at this session, this group should:

- (a) Continue the work on the safety problems posed by the carriage of dangerous goods packed in limited quantities under the current conditions;
- (b) Clarify the contentious issues in the study carried out by INERIS on behalf of the Government of France;
- (c) Take account of the UN Model Regulations and of the work being carried out by the UN Sub-Committee of Experts on the Transport of Dangerous Goods;
- (d) Focus the work on the problems arising solely in the context of European land transport, and seek solutions that would not cause any complications or obstacles to multi modal transport.

## Discussion

3. With regards to the risk associated with the carriage of limited quantities as described in the INERIS report mentioned in (b) of the mandate, some experts of the working group were of the opinion that the risk associated to this transport was significant.

The United Kingdom and FIATA said that, given the lack of incidents reported, they still had doubts about the risks posed and did not draw the same conclusions from the evidence presented in the INERIS report.

But the concern related to the carriage of these goods as large loads through road tunnels was specifically raised by some other experts:-

The expert from Norway shared the doubts expressed by the United Kingdom and FIATA although he could see that, in connection with transports through tunnels, it could be useful to have some indication related to limited quantities.

However, it was agreed that going into a detailed discussion on the INERIS report would not lead to constructive work.

4. In spite of the remaining doubts, a general agreement was reached that a simple piece of regulation commensurate to the problem could be inserted in RID/ADR.

5. Given the fact that packaging, marking of packagings and documentation are already dealt with in multi modal regulation, and considering the limited scope of the mandate (see (d)), it was decided to work on the marking of transport units applicable for inland transport without interfering with multi modal aspects.

6. In considering the subject the Working Group felt that:

- The marking should allow the emergency services and safety management authority (for example tunnel access control offices ...) to be aware of the nature of the load and its related risks.
- There should be some relation between the marking requirement and the global amount of limited quantities in the load, because the risk may be proportional to that amount.
- The marking should be simple to apply and should not lead to a excessive administrative burden.

7. After a long discussion the Working Group agreed on the proposal as drafted below.

8. The principles of this proposal are the following:

### **a) Thresholds for applying the marking**

- For road transport, it has been linked to the size of the vehicle. This avoids excessive administrative burden as regards to data bases or documents related to the

amount of goods carried: smaller transport units are exempted, bigger ones are subject to an optional system allowing exemption of smaller loads when the total amount to be carried can be easily estimated. The amount of 8 tonnes has been estimated in relation to the maximum loading capacity of transport unit with a maximum permissible gross weight of 12 tonnes.

- For rail transport, it was decided not to set up a threshold because rail doesn't have practical problems that road has with it different type of trucks.

#### **b) Type of marking**

The marking has been harmonized with one of the options available in the IMDG Code to facilitate multi modal transport

#### **c) Place of the marking**

It has been defined in a way that would facilitate the use of existing mechanisms for displaying orange plates

9. The annexed proposal lead to a consensus in the Working Group except for the words placed in square brackets in 3.4.10. Some experts were in favor of adding them to clarify enforcement issues, others thought they were superfluous. Concern was expressed that this part of the sentence could be interpreted as an obligation for some document being on board. It was pointed out that the demonstration could be done by any means, the way for that not being specified in the text. It was also noted that the wording in brackets would reverse the burden of proving the fact that the load was below the threshold, but some experts objected that practically enforcement agents would consider the requirement not being met until the carrier was able to prove it. It was recalled that in any case some common sense would have to be applied in practical situations.

10. Lastly, to allow the transport operators to adapt to these new provisions, a transitional period has been proposed. The date has been left open for the time being. Before the Joint Meeting the suitable date will be checked, considering the time necessary to do the practical changes.

### **Proposal**

#### **1. Add the following text at the end of Chapter 3.4**

“3.4.8 Consignors of dangerous goods packed in limited quantities shall inform the carrier of the total gross mass of such goods to be consigned, in advance of carriage not involving maritime transport.

3.4.9 Transport units with a maximum mass exceeding 12 tonnes / Wagons carrying dangerous goods packed in limited quantities shall be marked in accordance with 3.4.11 unless already marked in accordance with Chapter 5.3.

3.4.10 Markings specified in 3.4.9 may be dispensed with, if [it can be demonstrated that] the total gross mass of the packages containing dangerous goods packed in limited quantities carried does not exceed 8 tonnes.

3.4.11 Transport units / Wagons shall be marked "LTD QTY"<sup>2)</sup> in black letters not less than 65 mm high on a white background at the front and the rear / on both sides.

Markings according to chapter 3.4. of the IMDG Code are also acceptable.

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<sup>2)</sup> *The letters "LTD QTY" are an abbreviation of the English words "Limited Quantity".*

**2 Add the following transitional period to Chapter 1.6:**

“1.6.1.XX The provisions of sections 3.4.8 to 3.4.11 shall apply as from 1 January 20XX only.”

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