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**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

Working Party on the Transport  
of Dangerous Goods

(Seventy-fifth session, agenda item 5 (b),  
Geneva, 19 -23 January 2004)

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Information required in the transport document when transport takes place  
in accordance with 1.1.3.6

Transmitted by the Government of Denmark

**SUMMARY**

Executive summary:	The present text of the NOTE to 5.4.1.1.1 (f), which was introduced in ADR 2003, has created problems of interpretation and complicated the life of consignors and drivers. It is proposed to simplify the text.
Action to be taken:	Amend the text in NOTE under 5.4.1.1.1 (f).
Related documents:	TRANS/WP.15/2001/5 and TRANS/WP.15/165, para. 38.

**Introduction**

At the WP.15 meeting in May 2001, Norway proposed in TRANS/WP.15/2001/5 an amendment to the NOTE under 5.4.1.1.1 (g) [now (f)] to rectify the fact that the transport unit (and all its transport documents) and not the individual document was addressed. During the discussions, the Norwegian text was amended several times by means of oral proposals and the following text was adopted:

*NOTE: In the case of intended application of 1.1.3.6, the total quantity of dangerous goods for each transport category shall be indicated in the transport document in accordance with 1.1.3.6.3.*

It is regrettable that the note is now subject to yet another discussion but the present text creates two problems:

1. “The total quantity [...] shall be indicated [...] in accordance with 1.1.3.6.3”. The word “quantity” is usually associated with a value expressed in kilograms or litres, which is supported by the use of a reference to 1.1.3.6.3. If this interpretation is correct, the driver has - in order to ascertain whether 1.1.3.6 is applicable or not - to perform several multiplications and additions. This is contradictory to the common understanding that the driver should be bothered with as little arithmetic as possible. Therefore, the calculated value in accordance with 1.1.3.6.4 should be requested instead. In that way, the driver is not asked to perform anything but an addition of the values of each of the transport documents.
2. Having accepted the presence of the first problem, it does not make any sense to require a calculated value for each transport category. It is a requirement, which does nothing but add to the costs of the consignor when developing software.

### **Proposal**

Amend the text in the NOTE under 5.4.1.1.1 (f) to read:

“NOTE: In the case of intended application of 1.1.3.6 the total quantity of dangerous goods ~~for each transport category~~ shall be indicated in the transport document in terms of a calculated value in accordance with the principles set out in 1.1.3.6.4~~in accordance with 1.1.3.6.3.~~”

### **Justification**

- Safety: The proposal makes it simpler for the driver to ascertain whether 1.1.3.6 is applicable whereby the risk of mistakes is reduced.
- Feasibility: In the short term, consignors may have to adapt their software. However, in the long term, the amended text will lead to more satisfactory conditions.
- Enforceability: The text will become clearer and therefore enforceability is improved.
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