

**ECONOMIC COMMISSION FOR EUROPE**

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 from France**

**Marking of vehicles carrying dangerous goods in Limited Quantities (Chapter 3.4)**

**Transmitted by the International Road Transport Union (IRU)**

**1. Introduction**

The IRU Group of Experts on the Transport of Dangerous Goods (GEMD) examined at its meeting on 8 March 2006 in Brussels the French proposal (2006/12 and INF. 4) submitted to the Joint RID/ADR/ADN meeting of 20-23 March 2006 in Bern.

**2. Comments**

- The documentation requirement for LQ was taken out of the ADR in 2001 and was replaced by the introduction of the Limited Quantities (LQ) marking of packages; the proposed reintroduction of some particulars in the consignment note is considered as a step backwards;
- LQ rules have been introduced and accepted by the experts on the transport of dangerous goods because of the low risk (not a “no risk” as mentioned incorrectly in the INERIS study) of the goods packed according to Chapter 3.4 of the UN Model Regulations and RID/ADR;
- LQ are not flagged as dangerous goods in retail distribution (Boots, DM Markt, Di, etc.) as once the packaging and marking are done as per Chapter 3.4, the other Parts and Chapters of ADR do not apply. A lot of complications may be expected for those operators if the French proposal were to be adopted.
- The INERIS study is not dealing with incidents arising during transport of LQ. All the tests were carried out in storage facilities and the conclusions were simply “transposed” to transport operations;
- If the overall risk linked to the carriage of LQ is that high as stated by the French Government, fixing the threshold at a gross weight above 12t makes no sense;
- No cost/benefit analysis was undertaken.

**3. Conclusion**

The IRU and its members unanimously agreed that there is no safety or cost/benefit justification for changing the existing regulatory arrangements in Chapter 3.4 ADR and so reject the proposal set out in ECE/TRANS/WP.15/AC.1/2006/12.

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