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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, 20-24 March 2006)

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

**Marking of vehicles carrying dangerous goods
packed in limited quantities (Chapter 3.4)**

Proposal submitted by the Government of France*

* Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2006/12.

SUMMARY

Executive summary:

There is no means of identifying vehicles carrying dangerous goods packed in limited quantities. A study made in France and submitted to the United Nations Sub-Committee of Experts in 2002 revealed that the carriage of such goods in large loads presented significant hazards.

Action to be taken:

Amend Chapter 3.4 to make appropriate marking for vehicles carrying such goods mandatory above a certain mass. Minimum documentation is also necessary to enable the mass carried to be evaluated.

Related documents:

ST/SG/AC.10/C.3/2002/47 and INF.28 (United Nations Sub-Committee of Experts on the Transport of Dangerous Goods, twenty-first session, 1-10 July 2002).

Introduction

The United Nations Sub-Committee of Experts on the Transport of Dangerous Goods has on several occasions considered the issue of the transport of dangerous goods packed in limited quantities in order to specify harmonized minimum safety requirements between transport modes.

Despite several years of work it has still not been possible to arrive at a compromise.

France is concerned about the hazards caused by vehicles carrying large quantities of these goods. These were demonstrated in studies conducted in 2001 (see documents ST/SG/AC.1/C.3/2002/47 and its English version INF.28).

Independently of the work of the Sub-Committee, the Joint Meeting could adopt provisions for the marking of transport units and wagons without adversely affecting multimodal transport in that such provisions are in any case specific to RID/ADR.

The marking obligation would only apply above a threshold set at 12 tonnes. This can be explained by the fact that the hazard relates to the overall quantity of goods contained in the load. This enables local delivery operations, where the nature of the load is variable, to be excluded from these provisions.

The proposed marking is based on the existing orange-coloured plate marking, with the addition of the letters "LQ" to distinguish these operations from other dangerous goods transport operations. This also means that the new marking can be adapted to existing supports.

Provision should be made for simplified documentation to enable the mass of the load to be determined if it is within the limits of application of the requirement.

This simple documentation is compatible with the documentation required by the other transport modes.

Proposal

The text proposed differs according to whether it concerns RID or ADR.

RID

Add the following paragraphs to Chapter 3.4:

“3.4.8 All transport operations involving dangerous goods packed in limited quantities in accordance with this chapter shall be accompanied by the following particulars in the consignment note:

- The words ‘Dangerous goods packed in limited quantities’;
- The classes of the goods carried;
- The gross mass of the goods carried;
- The name and address of the consignor;
- The name and address of the consignee.

3.4.9 Wagons containing more than 12 tonnes gross mass of dangerous goods packed in limited quantities in accordance with this chapter shall carry on each side an orange-coloured plate in accordance with 5.3.2.2.1 marked ‘LQ’ in black letters not less than 20 cm high.

This marking is not required for wagons already marked in accordance with 5.3.2.1.1.”

ADR

Add the following paragraphs to Chapter 3.4:

“3.4.8 All transport operations involving dangerous goods packed in limited quantities in accordance with this chapter shall be accompanied by a transport document containing:

- The words ‘Dangerous goods packed in limited quantities’;
- The classes of the goods carried;
- The gross mass of the goods carried;
- The name and address of the consignor;
- The name and address of the consignee.

- 3.4.9 Transport units containing more than 12 tonnes gross mass of dangerous goods packed in limited quantities in accordance with this chapter shall carry two vertical panels in accordance with 5.3.2.2.1 with 'LQ' in black letters not less than 20 cm high. One panel shall be affixed at the front of the transport unit and the other at the rear perpendicular to the axis of the unit. They shall be clearly visible.

This marking is not required for transport units already marked in accordance with 5.3.2.1.”

Justification

For a detailed study of the performance of dangerous goods packed in limited quantities in accident situations the Joint Meeting is invited to consult document ST/SG/AC.10/C.3/2002/47 and its English translation INF.28, referred to above.

In brief, it may be noted that where performance in the event of fire is concerned, depending on the type of packaging used (materials that are combustible to a greater or lesser extent), reducing the size of the packaging does not proportionally reduce the risk. In certain cases, packages with limited quantities react as violently as packages of the same goods packed in regulated quantities.

With regard to pollution resulting from leaks, small quantities of toxic products may cause damage to the environment identical to that of regulated quantities of aquatic pollutants.

It is difficult to maintain that vehicles and wagons presenting a similar degree of risk to transport operations not subject to exemptions should not carry the slightest indication of this risk, which on the one hand would enable them to be monitored and on the other guide the emergency services in the event of an accident.
