
ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
(Eighty-second session)
Geneva, 7-10 May 2007

PROPOSAL FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Section 5.4.3

Instructions in writing
Comments on the proposal by Germany in ECE/ TRANS/WP.15/2007/4.

Transmitted by
the International Technical Committee for the Prevention and Extinction of Fire (CTIF)

Proposal: *Retain the current provisions (ADR 5.4.3.8)*

CTIF asks the WP.15 not to adopt the proposal in the document TRANS/WP.15/2007/4 and retain the current ADR provisions for the instructions in writing (ADR 5.4.3.8).

Justification:

CTIF, who represents the views of fire & rescue services from across Europe and America, and many relevant industrial companies believe that the current provisions are an excellent tool to inform the driver and others about safe actions in the case of an emergency. We share the concerns CEFIC has expressed in TRANS/WP15/79/inf08e as a reaction to the original proposal by FIATA-IRU (TRANS/WP.15/2005/17).

We believe that the proposal by Germany, ECE/TRANS/WP.15/2007/4, is not significantly different from the original proposal and does not therefore constitute an improvement that could be accepted.

The fire & rescue services we represent have consistently argued that the original proposal would lead to a reduction in the sources of information available in the first phase of any response to an emergency, particularly information on which the driver could clearly act paying due respect to the driver's safety.

CTIF recognises the determination of WP.15 that the instructions in writing are intended for the driver but contend that even the original proposal recognises that they have additional value;

Section 1, paragraph 2 of TRANS/WP.15/2005/17 states that

“...The measures taken by the driver...[is to provide]... information to the emergency services”.

ECE/TRANS/WP.15/2007/4 includes the revised entry

Inform the appropriate emergency services or environmental protection services, giving as much information about the incident or accident and substances involved as possible;

CTIF contends that if the proposal is accepted the driver could not provide any additional help to the emergency services if he does not speak their language. Conversely, the current provisions enable this communication simply by handing over the instructions in writing as soon as the emergency services arrive, enabling them to select the copy in their own language.

In addition to this we maintain all of the points previously made in paper TRANS/WP15/79/inf03e but ask WP.15 to consider the United Nations Recommendations on the Transport of Dangerous Goods Model Regulations.

At 5.4.3 in Volume II the UN advises on Emergency Response Information and the recommendation reads as follows;

For consignments for which a dangerous goods transport document is required..., appropriate information shall be immediately available at all times for use in an emergency response to accidents and incidents involving dangerous goods in transport. The information shall be available away from the packages containing the dangerous goods and immediately accessible in the event of an accident or incident. Methods of compliance include:

Appropriate entries in the transport document; or

Provision of a separate document such as a safety data sheet; or

Provision of a separate document, such as the International Civil Aviation Organisation (ICAO) “Emergency Response Guidance for Aircraft Incidents Involving Dangerous Goods” or the International Maritime Organisation (IMO) “Emergency Procedures for Ships Carrying Dangerous Goods” and “Medical First Aid Guide in Accidents Involving Dangerous Goods”, for use in conjunction with the transport document.

We believe that in the interests of Global Harmonisation efforts and continued high levels of safety we should not ignore these recommendations. The requirements of ADR in respect of the required Transport Documents do not fulfil the above recommendation. The current provisions do, and it would be foolish to take a step away from the UN Recommendations when we should be attempting to secure harmonisation.

CTIF is always willing to enter into discussion over matters that will improve public and emergency responder safety but we will resist any reductions, particularly those reductions proposed in the interest of simplicity.

The possible financial impact of the proposed changes does not justify the substantial reduction in safety.