

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
(Eighty-third session,
Geneva, 5-9 November 2007)
Agenda item 4

WORK OF THE RID/ADR/ADN JOINT MEETING

3.4 PLACARDING OF LARGER VEHICLES CARRYING LOADS OF LIMITED QUANTITIES (LQs)

Introduction

At the recent Joint Meeting held in Geneva between 11-21 September 2007, the original proposal from the Limited Quantities Working Group, set out in the paper ECE/TRANS/WP.15/AC.1/2007/60, proposed the following changes (The suggested paragraph numbers have been changed to account for previous changes to Chapter 3.4 and to align to what was agreed at the Meeting):

Add the following text at the end of Chapter 3.4

“3.4.9 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.

3.4.10 Transport units with a maximum mass exceeding 12 tonnes / Wagons carrying dangerous goods packed in limited quantities shall be marked in accordance with 3.4.12 unless already marked in accordance with Chapter 5.3.

3.4.11 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.

3.4.12 Transport units/Wagons shall be marked "LTD QTY"²⁾ 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.

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

The last sentence in 3.4.12 was intentionally put in by the authors at the Limited Quantities Working Group meeting to give the flexibility to use the IMDG system of “labels” being applied to the sides and rear of vehicles, instead of putting the ‘LTD QTY’ marking on the front and rear of the vehicle itself. This is particularly important when various HGV tractor units are used to move consignments in ‘box’ or fabric-sided trailers on shuttle operations. It avoids the need for all the tractor units that could be potentially used having to be equipped with the necessary brackets etc to carry the placards.

Unfortunately in the re-drafting at the Joint Meeting to deal with RID issues, this flexibility for vehicles appears to have been lost, and there is also some duplication of wording. Containers, on the other hand, can still be marked on all four sides, as is the case under IMDG Code, but in this case the load provision has been lost and it could be seen as requiring the new marking irrespective of the quantity of LQs involved or the size of the vehicle on which they are loaded.

For ADR, it will now read as follows:

- “3.4.9 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.
- 3.4.10 (a) Transport units with a maximum mass exceeding 12 tonnes carrying packages with dangerous goods in limited quantities shall be marked in accordance with 3.4.12 at the front and at the rear except when orange-coloured plate marking is displayed in accordance with 5.3.2.
- (b) Containers carrying packages with dangerous goods in limited quantities shall be marked in accordance with 3.4.12 on all four sides except when orange-coloured plate marking is displayed in accordance with 5.3.2. The carrying transport unit needs not be marked, except when the marking affixed to the containers is not visible from outside this carrying transport unit. In this latter case, the same marking shall be affixed at the front and at the rear of the transport unit.
- 3.4.11 Markings specified in 3.4.10 may be dispensed with, if the total gross mass of the packages containing dangerous goods packed in limited quantities carried does not exceed 8 tonnes per transport unit.
- 3.4.12 The marking shall consist of "LTD QTY"²⁾ 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.”

The new provision in 3.4.10(a), by specifying the way the markings are to be displayed on vehicles, negates the use of the IMDG method permitted in 3.4.12.

Although the 12 tonne vehicle and 8 tonne load provision may have been assumed to carry over into the new text for containers in (b), it does not read that way. If a sea journey is involved it may not matter as containers would be marked 'LTD QTY' anyway, but containers are not necessarily limited to multi-modal use.

However, the main concern remains the marking of HGV tractors and trailers. The use of the IMDG method should not be limited to multi-modal/ro-ro journeys under 1.1.4.2.

Proposal

Firstly, to avoid duplication, delete "at the front and the rear/on both sides" from 3.4.12.

Then either move "Markings according to chapter 3.4. of the IMDG Code are also acceptable" from 3.4.12 to create a new 3.4.10(c) or make into a new 3.4.13.
