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Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Bern, 23–27 March 2015

Item 8 of the provisional agenda

Future work

Debate on the necessity of a harmonised approach of the Section 5.4.3 Instructions in writing in RID/ADR/ADN

Transmitted by the Government of Romania^{1, 2}

1. The Romanian delegation analysed section 5.4.3 Instructions in writing, as currently worded in ADR, RID and ADN, and discovered that there are a series of different wordings in the texts which, in our opinion, do not reflect particularly the mode specificities.
2. Therefore, the Romanian delegation intends to propose a debate for the harmonisation of the approach of section 5.4.3 for all three transport modes.
3. It is true that the instructions in writing have been amended recently in WP.15, due the extensive effort of several delegations, and they were taken over for RID and ADN after that with some modifications.
4. The Romanian delegation was involved in the activities of the informal working group that drafted the new instructions in writing.
5. Nevertheless, the new instructions in writing introduced in ADR 2009, where amended in the 2011 version and again in 2015.
6. As we do not wish to launch a series of unnecessary amendments, we do not propose any in the present document. The experts are invited to share their experience on a series of

¹ In accordance with the programme of work of the Inland Transport Committee for 2014–2015 (ECE/TRANS/240, para. 100, ECE/TRANS/2014/23, cluster 9, para.9.2).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2015/1.

questions with regard to the content of section 5.4.3 in different transport modes, in order to decide on the follow up.

7. Our reasoning comes from the fact that the text was taken over from ADR in RID and ADN and this proves that it should be treated as common text, and harmonised to the largest extent possible.

8. In this context, we propose joining forces of inland transport modes to arrive to a common understanding of the topic at this level.

Proposal

9. The Romanian delegation wishes to ask the Joint Meeting to agree to a harmonization exercise for the three inland transport modes regarding the provisions of section 5.4.3 and some other connected requirements (e.g. obligations of the participants, specific training of the drivers/crew, etc.).

10. Thus, we think that the debates should cover at least the following topics:

(a) A harmonised approach for the text in 5.4.3.1 to 5.4.3.4;

(b) Is the obligation of the drivers/crew to take actions and/or intervene clearly expressed in 5.4.3.1 to 5.4.3.3? Should it be completed by a special paragraph in subsection 1.4.2.2?

(c) Should the ADR vehicle crew have any obligation in case of an accident/emergency during a Rolling Road (RoLa) or Roll-on/Roll-off (ro-ro) transport?

(d) A harmonised approach for the title and the subtitle in the first page of the instructions in writing:

ADR: Actions in the event of an accident or emergency;

ADN: Actions in the event of an accident or incident;

RID: Actions in the event of an accident or incident involving or likely to involve dangerous goods;

(e) A harmonised approach for the introductory phrase of the actions to be taken expressed in the first page of the instructions in writing:

ADR: In the event of an accident or emergency that may occur or arise during carriage, the members of the vehicle crew shall take the following actions where safe and practicable to do so;

ADN: In the event of an accident or incident that may occur during carriage, the member of the crew shall take the following actions where safe and practicable to do so:

RID: In the event of an accident or incident that may occur or arise during carriage, the drivers shall take the following actions where safe and practicable to do so:

(f) Is the footnote a on page 1 in the RID Instructions in writing really relevant? “Specifications contained in the railway regulations or railway operations shall be observed”.

(g) The contradiction between the provisions in 5.4.3.4 and the Note 2 on page 3 of the Instructions in writing with regard to the possibility of the transport operator to modify the content of column (3);

- (h) Are the Notes 2 and 3 on page 3 of the Instructions really necessary?;
- (i) The discrepancies between regulations in the hazard characteristics described in column (2);
- (j) The necessity to describe, in a synthetic manner, the equipment for personal and general protection in the instructions in writing:
- (i) ADN uses cross-references to tables A and C:
1. Is there a possibility to have a more synthetic way of expressing the information in tables A and C on the last page of the Instructions?;
 2. Is time saving relevant in the context of an accident or incident? Would it be more useful to look for the information on the equipment directly in the instructions in writing, than in the agreement?
- (ii) RID:
1. There is no specific indication on the use of the equipment for personal protection to be carried in the driver's cab.
 2. Which particular national specifications supplement the equipment, under footnote a on page 4? Is this footnote really relevant?
- (iii) ADR: the list of equipment is exhaustive, but maybe it should be clarified with regard to the following aspects:
1. Is the size of the collecting container, shovel and drain seal relevant?
 2. Which technical solutions could be envisaged for the form and the material of the drain seal?
- (k) The influence of telematics on the Instructions in writing:
- (i) Is it possible to use electronic equipment (laptops, tablets, smart phones) and read from such media the instructions in writing?
- (ii) Is it still necessary to have hard copies of the instructions in writing?
- (l) The effects of the development of class 9 and of the diverse class 9 future labels on the instructions in writing;
11. There are several interesting ideas that can be analysed for the different transport modes, as follows:
- (a) ADN: The provisions of the paragraph 1.3.2.2.5;
- (b) The provisions of the paragraph 1.4.2.2.6 (RID) which is proposed also for ADR will probably modify 1.4.2.2.1 (g) (ADN);
12. The actions to be taken by the personnel should be covered in the practical exercises in the training?
13. This debate could lead to the development of some common principles and approach.
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