



# Economic and Social Council

Distr.: General  
17 August 2023

Original: English

---

## Economic Commission for Europe

### Inland Transport Committee

### Working Party on the Transport of Dangerous Goods

#### 114th session

Geneva, 6-10 November 2023

Item 5 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:**

**Miscellaneous proposals**

## **Amendment to ADR 5.4.1.4 - Language requirements for the transport document according to ADR**

**Submitted by the International Association of Dangerous Goods Safety Advisers (IASA)\***

### *Summary*

**Executive summary:** The language requirements of ADR mean that consignors in most countries should be bilingual, since ADR documents should be drafted in the official language of the forwarding country as well as in English, French or German.

Modern logistic operations as well as the centralizing of electronic data processing (EDP), require quite substantial work to maintain language databases, solely for the purpose of fulfilling the language requirements of ADR.

In international transport operations, many companies, as well as many authorities communicate solely using one language, being either English, French, or German.

This proposal suggests bringing the language requirements of ADR in line with the language requirements of RID, allowing the transport document to be drafted in one or more languages. One of the languages must be either English, French, or German.

**Action to be taken:** The Working Party may wish to amend the language requirements in section 5.4.1.4 of ADR.

---

\* A/77/6 (Sect. 20), table 20.6



## Introduction

1. At the spring 2023 session of the Joint Meeting, in document ECE/TRANS/WP.15/AC.1/2023/6, IASA proposed to harmonise the language requirements in the transport document between ADR and RID. The results of the discussions are set out in report ECE/TRANS/WP.15AC.1/168. The first proposal in the document was supported by some delegations, whereas the second proposal received no support. IASA took into consideration all remarks made during the discussion in the drafting of this document. The representative of IASA thanked the delegates for the comments received and promised to submit a new document for the autumn session after evaluating the individual comments.

2. The requirements of ADR concerning the languages to be used in the transport document stipulate that the transport document must be drawn up in an official language of the country of dispatch and, if that language is not English, French or German, also in English, French or German. Modern logistic systems, communication and document transmission means allow the issuing of transport documents at central locations or in computer centres. The current language requirement in ADR makes this difficult.

3. Present text in ADR reads:

“The particulars to be entered in the document shall be drafted in an official language of the forwarding country, and also, if that language is not English, French, or German, in English, French or German, unless international road carriage tariffs, if any, or agreements concluded between the countries concerned in the transport operation, provide otherwise.”

4. Present text in RID reads:

“The transport document shall be filled out in one or more languages, one of which shall be in English, French or German, unless any agreements concluded between the countries concerned in the transport operation provide otherwise.”

## Proposal

5. Amend present text in 5.4.1.4 ADR to read

***“The particulars to be entered in the document shall be drafted in one or more languages, one of which shall be in English, French or German, unless any agreements concluded between the countries concerned in the transport operation provide otherwise.”***

## Justification

6. The average international transport operation mostly includes two or more different countries, the language of the consigning country is only relevant for the first leg of transport. That means that apart from in the consigning country, any member of the authorities, emergency services, member of the transport crew, or transporting companies as well as the consignee gain no advantage having the document in a language of the consigning country. For centralized document operations, the present massive work, in maintaining language databases just for the purpose of issuing documentation in a language with limited use seems unnecessary.

7. Authorities, emergency services and others are used to handle the text in English, French or German, and no unfortunate situations or neglect of safety are foreseen.

8. During the discussions at the spring 2023 session of the Joint Meeting, some delegations argued that the transport document must be drawn up in one of the consignor's national languages, otherwise the authorities would not be able to check these documents. The counter-argument here is that for example a consignment coming from Spain to Hungary, already has to be made out in English, German or French in addition to the national language of Spain. If the consignment then arrives in Hungary, the authorities must be able to check the document, even if the Hungarian language does not appear on the document. The

Hungarian language only appears, if a consignment is shipped from Hungary to elsewhere. Furthermore, most of the information in the transport document is coded, such as the UN number, packing group, hazard label, tunnel code, etc. Only the proper shipping name and the description of the packages is different in each language. Therefore, interpreting the documents in German, English or French should not be a real problem.

9. Moreover, it should be said that international rail traffic also applies the proposed linguistic requirements without there ever having been a problem because of it. It should also be noted here that neither RID nor the newly proposed text of ADR prohibits the voluntary use of the national language in addition. The possibility of using one of the three languages, analogous to the possibilities of rail transport, would create the possibility for the enterprises active in national and international transport to work in a single standardised language and database.

10. As was noted in the discussion of the proposal at the Joint Meeting's spring session, this rule would only be mandatory for international traffic and contracting parties are free to adopt other provisions for their national transport operations. For example, Switzerland has stipulated against ADR 5.4.1.4 in its national legislation for its Italian-speaking part of the country that the transport document may be established in the Italian language only, if the consignor and the consignee are in the Italian-speaking region Ticino.

---