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Groupe de travail des transports de marchandises dangereuses
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PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Comment on TRANS/WP.15/2005/17
Instructions in writing and protection equipment
Sections 5.4.3, 8.1.5, Chapter 8.5 and Chapter 3.2
(FIATA) & (IRU)

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

The proposals in the document TRANS/WP.15/2005/17 to simplify the “Instructions in Writing” are unacceptable to CTIF.

Justification:

A. “Single driver instruction written in a language that they understand”

CTIF is not in favour of the proposal to have the instructions in writing in only the language the driver can understand, because valuable information about the hazard of the transported good would not be available at an incident site for the various agencies which might be on the scene, such as police, medical emergency personnel, fire service and also inspection bodies.

These agencies within the ADR countries are currently not IT equipped or in possession of alternative information systems at the levels this proposal may believe.

Comparing the details of what is required in the “Instructions in Writing” with what is not required in the Transport Documents we contend that the latter is of extremely limited use in an emergency (especially in the early first phase of emergency service attendance) and the Instructions in Writing would be the document that emergency responders are trained to look for “*Save the driver and the papers*”.

The statement that these instructions are provided solely for the driver is no doubt technically correct. However, ADR is unclear as to whom the instructions are aimed at but there are clear indications that they are intended for others, as well as the driver.

5.4.3.4 states that “ *These instructions shall be kept readily identifiable in the drivers cab.*”

This suggests that they can be easily identified in the case of an emergency not only by the driver but by any emergency responder who may require them when the driver is unavailable for whatever reason.

5.4.3.8 specifically identifies what information the instructions should contain. This section is critical to understanding the purpose intended by the instructions in writing and how they can be beneficial to persons other than the driver. The first two sections cover LOAD and NATURE OF DANGER.

The LOAD section repeats the information on the Transport Document but goes further in that it is required to give a description of the “*...physical state, any colour and odour, to aid identification of leakages or spillages.*” This is very useful information for first responders.

The NATURE OF DANGER section is required to identify the “*Main danger; additional dangers, including possible delayed effects and dangers to the environment; behaviour under fire or heating (decomposition, explosion, development of toxic fumes etc; and if the goods ...react dangerously with water).*”

This last section is even more important in suggesting that the Instructions in Writing have significance to the Emergency Responder. This has to be considered in light of the section on FIRE in 5.4.3.8 in that “*Drivers should be instructed during training to deal with minor vehicle fires. They shall not attempt to deal with any fire involving the load.*” Given this element one must then consider that under NATURE OF DANGER the instruction to the driver about behaviour in fire must only be so that the driver can communicate this to other persons (Emergency Responders). If the instructions are only in the language of the driver, as is being suggested, then how could this additional information be communicated, if the driver could not speak the language of the Emergency Responder or was not available?

The proposed new Instructions in Writing which moves away from individual product related information to a more generic cover all scenario would not help at the scene of an incident, where very specific information is needed, in particular during the early stages. The section which covers the nine classes and all the sub groups appears very generic, class but not product specific, difficult to interpret and one would expect at the time of an incident (as FIATA & IRU suggest is the time to read this information) open to making simple errors in reading the right part and then taking the correct action, but the potential for fatal errors at a scene. Our experience shows that drivers very seldom know which of the classes and/or sub divisions of that class the product falls, so as to be able to even identify the right part.

Proposal Part B.

“Harmonize the different items of personal protection equipment referred to in the instructions in writing and to include them in a mandatory list”

In relation to the proposal for a table to be included in ADR 8.1.5, one may recall that in 1997 CTIF has already suggested that there should be some basic equipment on board of vehicles carrying dangerous goods which allow the driver to contribute to the mitigation of the

effects of an accident without posing himself to an unacceptable risk. The proposal was not adopted by split decision.

CTIF therefore welcomes the idea to introduce such a list in ADR. However the content of the current table as proposed requires careful review in relation to its content. For example the requirement for a drain seal appears to be limited to classes 3, 8 and 9 although such a seal may be beneficial where a leakage of liquid substances of other classes are involved; plastic collecting container may not be suitable for small leak of materials transported at elevated temperatures etc. The content of such a table should therefore be agreed within a consultation group.

CTIF is willing to cooperate in such a consultation group.
