

INF. 6

Working Party on the Transport
of Dangerous Goods
(Eighty-third session,
Geneva, 5 -9 November 2007
Item 5 (a) of the provisional agenda

Section 5.4.3 of ADR

Instructions in writing

Comments to document ECE/TRANS/WP.15/2007/25 from Germany

Transmitted by the Government of Norway

1. Background

Norway thinks the proposal from Germany for new texts regarding the instruction in writing is a workable compromise in regard to the outcome of the working group that was tasked to draft new provisions for the instruction in writing for the driver. We nevertheless would like to see some changes to the proposed text.

We first of all would like to comment that the request for protective goggles and eye rinse liquid for Class 1 substances and articles seems a bit over the top, and should be deleted. We also query the need for two different types of gloves for vehicles carrying Class 1. This should also be deleted.

Furthermore, we have doubts about the requirement for an emergency escape mask the way the text is formulated. At least it should be made clear that it must be of a type that fits all personnel, including those with a beard. Otherwise it may cause more harm than help.

We also would like to see the requirement for drain seals go, since this in our opinion is not something that the driver shall occupy himself with. First of all, he would never know where to find the drains, and searching for these could distract him from his primary task of alarming and warning the emergency services and keeping other traffic out of the area of the incident/accident.

When it comes to the "shovel and collecting container", we think that larger vehicles already are equipped with this for other purposes, but it would constitute a problem when requiring this for all vehicles carrying dangerous goods, in particular for smaller vans. We are afraid that this requirement will mainly be fulfilled for the sake of the inspection bodies. As mentioned above, the possibility for having a collecting container along on all vehicles will mean that this will have to be rather small, and then we wonder what help it will be except for very small leaks that probably does not constitute a real threat to the environment anyway. Furthermore, we do not understand the reasoning behind the choice of the few classes the equipment is allotted to.

This clearly shows the problem of having such a detailed list. All the inconsistencies become clear. It is much easier to accept the inconsistencies when the list is presented as a generic list for all vehicles, but it is very difficult to accept (or defend) some of the equipment when listed against each class. We can see the rationale for having the information on equipment also in the

instructions in writing, but in our opinion this should be done by repeating the list in 8.1.5, and thus avoid the problem mentioned above.

Regarding the additional guidance table, in column (2) in the first entry of Class 1, "intense fire/heat flux" should be added, since this will be the main hazard from most of the 1.3 substances. Furthermore, the word "fire" should also be added in column (2) for the 1.4 label. The text in column (3) for the 1.4 label should also be shortened to "Take cover". Otherwise there will be no difference between these explosives and the detonable explosives, which does not make sense.

2. Proposals

- a) In column (2) in the first entry for Class 1, in the first sentence, replace "combustion;" by "intense fire/heat flux;"
- b) In column (2) in the entry for label 1.4, add the words "and fire";
- c) The text in column (3) for the 1.4 label should be shortened to "Take cover";
- d) Substitute the table of equipment after the heading of the proposed table with the following text:

"The following equipment shall be carried on board the transport unit :

- for each vehicle, a wheel chock of a size suited to the weight of the vehicle and to the diameter of the wheel;
- two self-standing warning signs;
- eye rinsing liquid ¹⁾; and

for each member of the vehicle crew

- a warning vest (e.g. as described in the EN 471 standard);
- a pocket lamp;
- a pair of gloves made of nitrile rubber and a pair of gloves made of leather; and
- protective goggles.

Additional equipment required for certain classes:

- an individually adapted emergency escape mask ²⁾ for each member of the vehicle crew shall be carried on board the vehicle for danger label numbers 2.1 ³⁾, 2.3 and 6.1;

¹⁾ *Not required for danger label numbers 1.1, 1.4, 1.5, 1.6, 2.1, 2.2 and 2.3.*

²⁾ *For example an emergency escape mask with a combined gas/dust filter of the A1B1E1K1-P1 or A2B2E2K2-P2 type which is similar to that described in the EN 141 standard.*

³⁾ *Only required in combination with danger label number 6.1."*

- e) If the decision of the working party is to have the table, then in the table delete the “X” for protective goggles and eye rinse liquid as well as the requirement for gloves in the column for Class 1 substances and articles, change the beginning of the text in the 8.th line of the column “Items of equipment” to read; “An individually adapted emergency escape mask ...”, and delete the last three entries for “Shovel”, Drain seal” and “Collecting container made of plastics”, as well as footnote 2;
- f) In the proposed new text for 8.1.5.2, in footnote 1, add: ”1.1, 1.4, 1.5, 1.6, ...”;
- g) In 8.1.5.3, change the text of the first indent to read “an individually adapted emergency escape mask ...”;
- h) In 8.1.5.3, delete the last three indents, as well as the footnotes “2” and “5”.
