

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

21 October 2011

Ninety-first session

Geneva, 8–11 November 2011

Item 5(b) of the provisional agenda

Proposals for amendments to Annexes A and B of ADR: miscellaneous proposals

Amendments to Table A in Chapter 3.2 according to Section 7.5.11 and Chapter 8.5

Transmitted by the Government of Romania

1. While revising Table A in Chapter 3.2, the Romanian delegation discovered that the terms used under the heading “Special provisions for carriage” for columns (16), (17), (18) and (19) present a series of inconsistencies. Sections 7.2.4 and 7.3.3 refer to “Special provisions”, section 7.5.11 refer to “additional provisions” and Chapter 8.5 refers to “additional requirements” – in the title, and the different requirements within this chapter are either:

- “Additional requirements” (S1, S2, S4);
- “Special provisions” (S3, S5, S6) or
- “Other additional requirements or special provisions” (S7 to S24).

2. There are also wording differences between English and French for Chapter 8.5, and Section 7.5.11.

3. We present the headings of Table A we referred to:

Special provisions for carriage			
Packages	Bulk	Loading, unloading and handling	Operation
7.2.4	7.3.3	7.5.11	8.5
(16)	(17)	(18)	(19)

Dispositions spéciales de transport			
Colis	Vrac	Chargement, déchargement et manutention	Exploitation
7.2.4	7.3.3	7.5.11	8.5
(16)	(17)	(18)	(19)

7.2.4	Special provisions
	Dispositions spéciales
7.3.3	Special provisions for the carriage in bulk when the provisions of 7.3.1.1 (b) are applied
	Dispositions spéciales pour le transport en vrac lorsque les dispositions du 7.3.1.1 b) s'appliquent
7.5.11	Additional provisions applicable to certain classes or specific goods
	Dispositions supplémentaires relatives à des classes ou à des marchandises particulières
8.5	Additional requirements relating to particular classes or substances
	Prescriptions supplémentaires relatives à des classes ou à des marchandises particulières

As a consequence, the Romanian delegation wishes to ask WP.15 whether:

a) There is a difference from a legal point of view between the “Additional requirements” and “Special provisions”, as both wordings are used in Chapter 8.5 under the title “Additional requirements relating to particular classes or substances” and all provisions are identified under the code “S”.

b) If columns 18 and 19 which are grouped under the title Special provisions for carriage and which refer to the “Additional provisions” in 7.5.11 and, respectively, additional requirements or special provisions in Chapter 8.5 (ex.:S1(4)) should be included under this heading taking into consideration the “carriage” definition in 1.2.1 which does not refer to loading, unloading and handling.

4. If the working group considers that it is necessary to amend the heading “Special provisions for carriage” of Table A, the Romanian delegation might present an official document for the next session taking into consideration all the observations and proposals during the current session.

5. The Romanian government also wishes to ask the WP.15 to find the best harmonised wording for sections 7.5.11 and Chapter 8.5 in order to eliminate the current inconsistencies.