

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

103rd session

Geneva, 6-10 November 2017

Item 4 of the provisional agenda

Work of the RID/ADR/ADN Joint Meeting

1 November 2017

Proposed amendment of 5.3.2.1.4 and 5.3.2.1.6 of ADR: impact on carriage of Class 7 dangerous goods

Transmitted by the Government of the United Kingdom

Summary

- Executive summary:** The United Kingdom is concerned that the proposed amendment of 5.3.2.1.6 will remove the current concession relating to side-mounted orange plates for Class 7 transport in packages.
- Action to be taken:** Amend or reject the proposed amendment to 5.3.2.1.6 as given in square brackets in INF.3.
- Reference documents:** ECE/TRANS/WP.15/2017/10 and INF.3

Introduction

1. In ECE/ TRANS/WP.15/2017/10 at the 102nd meeting, Austria proposed an amendment to 5.3.2.1.6 with the aim of clarifying the existing text. As there was no final agreement on the proposed wording at that meeting nor at the September 2017 session of the Joint Meeting, it remains in square brackets in INF 3.
2. The United Kingdom believes that the intent of the existing text is already sufficiently clear, but we also wish to draw the attention of WP.15 to the consequences of adopting the amendment as proposed for the carriage of Class 7 dangerous goods.
3. Class 7 cargoes carried under exclusive use are currently subject to the requirements of 5.3.1.3.4, but also covered by the concession set out in 5.3.2.1.6 regarding the use of side-mounted orange coloured plates. Under the proposed amendment, this concession could no longer be applied, because it only provides for carriage in fixed tanks, portable tanks, demountable tanks, tank-containers, MEGCs or in bulk, whereas Class 7 is usually carried packaged and in regular trucks or vans. A large number of Class 7 transport movements are likely to be affected by this change.
4. This might be resolved by simply removing the phrase "...fixed tanks, portable tanks, demountable tanks, tank-containers, MEGCs or in bulk....." from the proposed amendment. The United Kingdom's preference remains however for no change to the existing wording and layout.