

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

19 February 2020

Bern, 16 -20 March 2020

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN
new proposals

Modification of the general information in subsection 5.4.1.1.1 (f) required in the transport document

Transmitted by the Government of the Netherlands

Introduction

1. Subsection 5.4.1.1.1 (f) of RID/ADR states: ‘the total quantity of each item of dangerous goods bearing a different UN number, proper shipping name or, when applicable, packing group (as a volume or as a gross mass, or as a net mass as appropriate)’.
2. The words ‘as appropriate’ in this provision give room for interpretation and multipurpose use. This means that in some cases the quantity is mentioned in ‘kilograms’ in the transport document while it would be better to mention it in ‘litres’ for enforcement purposes of the degree of filling in subsection 4.2.1.9 of RID/ADR.
3. In daily practice, the Dutch Inspectorate for the Transport of Dangerous Goods encounters difficulties during enforcement, for example when checking the degree of filling of a tank in accordance with subsection 4.2.1.9 of RID/ADR. The experience of the Dutch Transport Inspectorate is that in many cases the quantity of liquids in tanks is mentioned in the transport document in kilograms and not in litres. This makes it difficult to calculate the degrees of filling in accordance with subsection 4.2.1.9 of RID/ADR during road checks.
4. On the other hand, NOTE 1 of subsection 5.4.1.1.1 (f) in ADR is quite clear. Because, when 1.1.3.6.3 is applied, it refers to this subsection which clearly mentions when kilograms or litres shall be mentioned for the total quantity in the transport document.
5. The Netherlands proposes to clarify subsection 5.4.1.1.1 (f) of RID/ADR and amend it in accordance with subsection 1.1.3.6.3 of RID/ADR.
6. Another way to clarify this issue is to include a definition of ‘total quantity’ in the definitions of Chapter 1.2 of RID/ADR with the same indication as mentioned in this proposal and consequentially adjust the subsections 1.1.3.6 and 5.4.1.1.1 (f).
7. The delegations in the Joint Meeting are invited to give their opinion on this approach, the proposal for amending RID/ADR and to express their preference to modify RID/ADR (amend subsection 5.4.1.1.1 (f) or include a definition for total quantity in Chapter 1.2). The Netherlands would be willing to submit an official document with proposals for the next meeting according to the outcome of this discussion.

Proposal

8. Amend only the first paragraph of subsection 5.4.1.1.1 (f) in RID/ADR, not the NOTES (new text is in **bold underlined print** and deleted text is ~~stricken through~~):

the total quantity of each item of dangerous goods bearing a different UN number, proper shipping name or, when applicable, packing group ~~(as a volume or as a gross mass, or as a net mass as appropriate);~~

In this case the ‘total quantity’ means:

For articles, gross mass in kilograms (for articles of Class 1, net mass in kilograms of the explosive substance);

For solids, liquefied gases, refrigerated liquefied gases and dissolved gases, net mass in kilograms;

For liquids, the total quantity of dangerous goods contained in litres;

For compressed gases, adsorbed gases and chemicals under pressure, the water capacity of the receptacle in litres.

Justification

9. Safety : the amendments in the subsection improve safety of the transport.
10. Feasibility : it promotes and clarifies the practicability of the provisions.
