

**United Nations Committee of Experts
on the Transport of Dangerous Goods**

(Twenty-first session
4-13 December 2000,
agenda item 2 (b))

**Draft amendments to the Recommendations on the Transport of Dangerous Goods
Chapter 3.4 – Limited Quantities**

Placarding of Transport Units

**Transmitted by the European Confederation of Paint, Printing Ink and Artists Colours
Manufacturers Association (CEPE)**

**Comments on Proposal ST/SG/AC.10/2000/10
transmitted by the experts from Australia, Germany and Sweden**

1. CEPE Involvement

In the background section of ST/SG/AC.10/2000/10, mention is made of the meeting of a working group in Bonn on 4th September 2000, which included a representative from CEPE. Representatives from industries took part in the preliminary discussions, they were explicitly excluded from the final drafting of the document. CEPE believe that the proposals will be unworkable for distribution by land transport.

2. Practicality of Proposals

The risks associated with consignments in small pack sizes in small vehicles such as vans involved in final distribution are minimal compared to full loads on large trucks – indeed the risk from the fuel tank is likely to be higher.

Also, during distribution, consignments can be picked up and set down in the course of a journey, making it a complex operation for the driver to be continuously placing and removing placards – there would be the danger that placards would be left in place after deliveries, with the potential for misleading the emergency services.

It is appropriate for the maritime authorities to require placarding of transport units on board ship, as confined spaces are involved, making fire fighting and evacuation more difficult.

3. Overall Position on Limited Quantities

CEPE considers that the Committee of Experts should not try to harmonise modal operational arrangements at this stage, when so many other matters relating to Limited Quantities are still in need of resolution. However, it recognises that the Sub-Committee at its July 2000 meeting did agree in principle to the placarding of transport units containing Limited Quantities, but without specifying modal arrangements.

CEPE believes that, if the Committee still decides to proceed at this stage, the concerns of the fire and other authorities will be met if only the largest loads and vehicles are recommended in the Model Regulations to be placarded, as this is where the risks could be relevant and deals with major trunk consignments. This will leave the modal authorities free to regulate at a lower level (as already done in the IMDG Code) where circumstances demand. The placards chosen should be of a similar design to those used already for other purposes.

4. Principles

CEPE believe it to be inconsistent to require placarding for loads of Limited Quantities, yet still not require them for explosives of 1.4S and excepted packages of Class 7.

5. Conclusion

The proposals in ST/SG/AC.10/2000/10 should be rejected in its current form. All the matters relating to Limited Quantities should be considered as a whole.

20 November, 2000
