

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
(Eightieth session,
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INSTRUCTIONS IN WRITING

Note by the secretariat

At the request of the International of Road Transport Union (IRU), the secretariat reproduces below a document prepared by FIATA and IRU which will be discussed by participants to the informal working group on “improvement of the System for Instructions in Writing and Protection Equipment” which will be hosted by these two organizations in Bonn on 28-29 March 2006.

Related Documents:

- TRANS/WP15/2005/17
- TRANS/WP15/79/INF 3
- TRANS/WP15/79/INF 8
- TRANS/WP15/79/INF 26

At its 79th session WP.15 has decided to establish a working group with the following **Terms of Reference** adopted as presented in INF 26:

- a) Consider the possibility of the use of a single instruction in writing (driver instruction) to be carried on board the vehicle for any transport operation.
- b) Consider the possibility to limit the language used to one the driver can read and understand.
- c) Consider the use of a binding list of personal protection for any transport operation.
- d) Consider a stronger relation between actions to be taken by a driver and ADR training of drivers.

In order to have a clear mandate for the working group **WP.15 confirmed that instructions in writing, according to 5.4.3 ADR, are addressing trained drivers.** The measures to be taken by the driver focus on self-protection, the warning of third parties as well as to notify e.g. rescue services and police about the accident/incident including handing over transport documents.

Measures exceeding the limited capabilities of the drivers are carried out by the emergency services, which use additional systems that are designed to meet their specific needs.

Whereas, the critical review of the FIATA/IRU proposal (TRANS/WP.15/2005/17) to improve the system of instructions in writing during the WP.15 session has shown the need to explain in more details those items which seem to be unclear or even misleading.

1. The FIATA/IRU proposal states that a written instruction must only accompany the driver in a language that he can read and understand. However, if the proposal was adopted, the single driver instruction would be available to all interested parties in their mother tongue as this text is to become a composite part of the ADR. Emergency and rescue services as well as ambulance and police would be enabled to carry the written instruction in their operation vehicles in their language at any time. This prevents rescuers from entering the driver's cab in order to search for written instructions in case the driver is not able to hand it over, and thus possibly placing rescuers in danger or, at least, losing valuable time.
2. The fact that according to the FIATA/IRU proposal and as confirmed by WP.15 a written instruction must only be formally adapted to the needs of the driver does not of course exclude its use at the accident site by emergency and rescue services for **initial assistance measures**.

But even for the existing system limits are reached when emergency and rescue services, who are specially trained to deal with accidents involving dangerous goods, work with special equipment and require more specific information than the present system of instructions in writing provides. Therefore, in 1993 with the financial support of the European Commission (DG VII) an international group of experts from the chemical industry and from fire brigades started to develop ERI (Emergency Response Intervention) Cards. Today, in a total of 230 ERI Cards, this system contains **group-specific (danger related and not substance related)** information covering 2,200 substances according to the following structure:

1. Characteristics
2. Nature of danger
3. Personal protection
4. Intervention actions
 - 4.1 General measures
 - 4.2 Measures after substance spilling/leakage
 - 4.3 Fire (involving the substance)
5. First aid
6. Essential precautions for product recovery
7. Precautions after intervention
 - 7.1 Undressing
 - 7.2 Equipment clean-up

Experiences gained over the last ten years have shown that this group-specific information is suitably differentiated and detailed to fulfil the requirements of specialised emergency and rescue services. Therefore, it appears to be not logical that drivers as well as not specifically trained emergency and rescue services shall require even more differentiated – i.e. substance-specific – information.

The FIATA/IRU appraisal of the situation is further supported by the fact that the contents of today used substance-specific instructions in writing for dangerous goods with the same danger nature (expressed by danger labels) are, as a rule, identical to a large extent.

3. The reservations made by some delegates during the 79th session that the proposal could create new problems particularly for goods with several different natures of danger are unjustified. On the contrary, the clear structure and layout of the proposed document enables any user to obtain a rapid appraisal of the natures of danger and the required measures. Today's system, particularly for mixed consignments, is even more complicated and prone to error.
4. The consignor according to ADR, who has to provide written instructions, is not necessarily the producer of dangerous goods who has detailed product knowledge and can be held liable for wrong information in the written instruction. Today in many cases written instructions provided by freight forwarders, retailers and consignors other than producers are published or issued on CD ROM or other means available through specialist book stores.

The FIATA/IRU proposal does not state, in any way whatsoever, that the carrier should determine the **contents** of the written instruction. The contents are to be fixed by

WP.15 and to be included into the ADR. Here, it goes without saying that the improvements already suggested by some delegations could and should be taken into account.
