

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
(Eightieth session,
Geneva, 8-12 May 2006)

**SUMMARY REPORT OF THE INFORMAL UNECE WORKING GROUP
ON INSTRUCTIONS IN WRITING**

Bonn, 28-29 March 2006

Transmitted by the International Road Transport Union (IRU)

I. PARTICIPATION

The meeting was chaired by Mr. Arne Johansen (Norway).

Participating countries: Austria, Belgium, Denmark, Germany, Italy, Norway, Romania, Spain, Sweden and the UK.

Participating NGOs: AISE, CEFIC, CTIF, EIGA, FIATA, ICCTA, G.E.A. and the IRU.

The attendance list is attached in Annex 1.

II. RELATED DOCUMENTS

Documents 2005/17 (FIATA/IRU), INF.3 (CTIF), INF.8 (CEFIC), INF.26 (FIATA) and INF. 3 (FIATA/IRU) for the up-coming 80th WP.15 session were presented once more by the respective NGOs to refresh minds.

FIATA explained that as many instructions in writing, issued by different consignors, contain similar information or even in some cases contradictory information for the same substances, FIATA and the IRU proposed to collect the information really needed by drivers in one single mandatory instruction for every substance and every transport operation. The content of the single instruction may be the subject of amendments as long

as the principle of one binding list of actions and equipment would be the outcome. FIATA also underlined that there was a misunderstanding at WP.15 concerning responsibility. If one single instruction in writing were accepted, the carrier would only be responsible for providing this instruction to the driver in a language he understands. The content of the instruction would be part of ADR and consequently would be translated into all the languages of the contracting parties. The IRU stated that only if one single instruction were the outcome, the road transport industry would be willing to accept that the consignor no longer has to provide the instruction in writing to the driver.

CEFIC mentioned that after further discussions, most arguments evoked in INF.8 remain valid. The current system could be improved by making a difference between transport in bulk and transport of mixed loads of packaged goods, by developing standard instructions in writing for substances transported in big quantities (e.g. petroleum, LPG, etc). Consignors should however retain the possibility to provide additional product-specific information.

CTIF disagreed with the FIATA/IRU proposal as the information in the proposed single instruction is no longer useful for emergency services such as the police and ambulance services.

III. TERMS OF REFERENCE

The informal working group got a clear mandate from WP.15. The chairman reminded the terms of reference and requested the participants to stick to them.

If some time is left, the new Italian INF. paper on instructions in writing may be presented.

IV. A SINGLE INSTRUCTION IN WRITING

4.1. Concerning the principle

The UK representative pointed out that WP.15 clearly indicated that the instructions in writing are addressed to the driver, even if emergency responders consider these as containing useful information for them. Hazard communication for emergency responders may however be obtained by other means, like for example the transport document, the plates, the hazard labels, etc. So, he agreed upon a single instruction in writing, formulated in a very simple way because giving drivers a role to deal with in case of an incident or accident will create problems and possibly raise issues of liability.

All government representatives agreed that the current system is not satisfactory and has to be reviewed.

The following arguments were evoked during the debate:

- UN numbers more important for emergency services than a document in the truck (Norway, UK);
- Difference has to be made between tank/bulk vehicles and packaged goods (Norway, Denmark, CEFIC, AISE);
- Governments should regulate in transport safety provisions how to prevent incidents instead of regulating what to do in case of an incident (UK);
- 5.4.3.7 related to mixed loads is a permanent source of confusion (Belgium);
- Drivers do not read the instructions and the bad quality of copies provided makes the instructions unreadable in the end (Belgium, Italy, AISE);
- The emergency response issue has to be regulated in ADR but may be done in a harmonised and compact way, thus solving the language issue by publication of the instruction in writing in ADR. If needed, two different systems – for mixed loads and bulk/tank- could be accepted as a compromise (Germany);
- 80% of the information in the current instructions in writing is similar (Belgium, Spain, FIATA, IRU).

Some delegates however considered the FIATA/IRU proposal as going too far (Spain, Austria).

GEA, EIGA and Italy mentioned that practical and simple instructions for drivers were sufficient. The representative of GEA also referred to the US *Emergency Response Guidebook for first responders* and gave a copy to all participants. Reference was also made by CEFIC to the ERICards (Emergency Response Intervention Cards for emergency services). ICCTA mentioned that 60.000 copies of the US *Emergency Response Guidebook* were distributed in Germanic countries.

The government delegates adopted with a large majority the principle to have a single instruction in writing for the driver.

4.2. Concerning the content of document 2005/17

The UK proposed finding an appropriate place in the ADR to enumerate the measures to be taken by the driver in case of an incident or accident, thereby obviating the need for written instructions at all, and to limit the personal protection equipment in 8.1.5 to a first aid kit and the vehicle equipment to that specified in 8.1.5 (a) and (b).

This proposal was not adopted. With the exception of Norway, who supported the UK approach, all other government representatives were of the opinion that as drivers only undergo refreshment training every five years, a short compacted instruction in writing on labels, hazard characteristics and additional measures was useful, for the driver as well as the crew and the emergency services. Denmark even explicitly stated that a single instruction in writing should be at least as detailed as the FIATA/IRU proposal.

Page 1

The FIATA/IRU model was replaced by the adopted text proposal from the UK (see Annex 2).

Pages 2 and 3

The proposal from the UK, supported by Norway, Sweden and CEFIC, to delete pages 2 and 3, as the driver should not take any other actions than those stipulated on page one, was not accepted. Consequently, the content of those pages was discussed. The recommendation by Austria to set up a subgroup of representatives of drivers, emergency services and the industry to discuss those specific pages was left open.

Column 1: adopted concerning the principle. FIATA and IRU were, however, requested to use all specimen labels of 5.2.2.2 and to mention the optional insertion of any text on some labels.

Column 2: adopted concerning the principle. Content not discussed yet.

Column 3: majority of government representatives considered additional measures necessary. One agreed upon the fact that this column should be entitled “Precautionary measures”. Content of the particular measures not defined yet.

Column 4: following an animated debate, the majority of government delegates decided to adopt the CTIF proposal to enter a new column “Recommended safety distances” in the table. These distances may be based, either entirely or partly, on the US Emergency Response Guidebook but this question still remains undecided.

Page 4

Not examined yet due to lack of time.

V. LANGUAGE

As the working group adopted the principle of a single instruction in writing, it was agreed to limit the language to one the driver can read and understand.

The argument that emergency responders need to have it in their language too, became redundant because the single instruction in writing will be part of ADR and consequently translated into the languages of all contracting parties.

VI. HARMONISED PROTECTION EQUIPMENT

Not examined yet due to lack of time.

VII. ADR TRAINING OF DRIVERS

All government representatives agreed that no stronger relation between actions to be taken by the drivers and the ADR training of drivers was requested. The existing text on ADR driver training is as strong as it needs to be.

VIII. FURTHER STEPS

As the working group did not finalise its mandate according to the terms of references, no proposal can be submitted yet to the WP.15 in May 2006.

A new meeting of the working group will be held in Brussels to finalise its activities. Date proposals will be submitted by the IRU in due course.

Annex 1

List of participants

UNECE WP.15 - WG on Instructions in Writing

Bonn, 28-29 March 2006

Name	First Name	Country	Ministry/ NGO
Calleja	Lea	Spain	Ministry
Cuciureanu	Mihai	Romania	Ministry
Gennen	Chantal	Belgium	IRU
Geysels	Liesbeth	Belgium	IRU
Gryglewicz	Lucien	Belgium	AISE
Gullö	Josefine	Sweden	Ministry
Hart	Jeff	UK	Ministry
Huster	Frank	Germany	FIATA
Johansen	Arne	Norway	Ministry
Jonckheere	Filip	Belgium	CEFIC
Kirkov	Nikolay	Bulgaria	IRU / AEBTRI
Koessl	Friedrich	Germany	EIGA
Krammer	Othmar	Austria	Ministry
Laufhütte	Klaus	Germany	Ministry
Mari	Renato	Italy	CEFIC / Federchimica
Marmy	Jacques	Switzerland	IRU
McCulloch	Alex	Belgium	Global Express Association
Nuessler	Dieter	Germany	CTIF
Pearson	Andrea	UK	Ministry

Pels	Adriaan	Netherlands	IRU / EVO
Renard	Claude	Belgium	Ministry
Sigrist	Erwin	Switzerland	CEFIC
Simoni	Alfonso	Italy	Ministry
Steinbach	Peter	Germany	ICCTA
Strange	Majken	Denmark	Ministry
Ström	Katarina	Sweden	Ministry
Voinicu	Alexander	Romania	Ministry

Annex 2

Instruction in Writing *(New page n°1)*

[5.4.3.?)

In the event of an incident or accident the driver shall take the following action where practical to do so:

- Stop the engine, disconnect the battery master switch and apply the braking system;
- Avoid sources of ignition;
- Put on the warning vest and place the self-standing warning signs as appropriate;
- Inform the appropriate emergency services or environmental protection services, giving as much information about the incident or accident and substances involved as possible;
- Do not leave the vicinity of the incident or accident and keep the transport documents readily available for responders on arrival;
- Move to a safe distance and keep other persons away from the vicinity of the incident or accident;
- Where appropriate and safe to do so, use the fire extinguishers to put out small/initial fires in tyres, brakes and engine compartments;
- Fires in load compartments shall not be tackled;
- Do not walk into or touch spilled material, avoid inhalation of fumes, smoke and vapours;
- Remove any contaminated clothing.