ECONOMIC COMMISSION FOR EUROPE **INF.5E**

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern, 20-24 March 2006)

PROPOSAL TO AMEND THE TEXT OF THE RID/ADR

Part 1 of RID/ADR

1.1.3.6.3 Maximum total quantity per transport unit

Transmitted by the Government of Norway

SUMMARY	
Executive Summary:	Adjustment of the definition of "maximum total quantity per transport unit" in 1.1.3.6.3 for dangerous goods in machinery and equipment, to take account of the situation where very heavy equipment contains small amounts of dangerous goods.
Action to be taken:	Add a new indent to the text under the table of 1.1.3.6.3 to take account of this situation.
Related documents:	None.

Introduction

The present wording of the text of the first indent after the table in 1.1.3.6.3 defines "maximum total quantity per transport unit" for articles to be "the gross mass in kilograms, except for articles of Class 1 where it is the net mass in kg of the explosive substance". There are also a lot of other articles (machinery and equipment) for which the use of gross mass does not make sense. A typical example where the user does not understand this is UN 3091 LITHIUM BATTERIES CONTAINED IN EQUIPMENT, were the amount of dangerous goods may be extremely small in comparison with the gross weight, and for which Transport category 2 (333 kg) is given.

Proposal

Add a new text as the second indent under the table in 1.1.3.6.3 to read:

"- for dangerous goods in machinery and equipment, the total mass of dangerous goods in kilograms or litres as appropriate."

Justification

As mentioned above, the use of gross mass does not make sense when it comes to dangerous goods in machinery and equipment. For the example with UN 3091 above, it is not unusual in the offshore oil industry to lower tubes into the boreholes with various equipment containing lithium batteries. Such tubes will normally weigh around 1500 kg, but only have lithium content of a few grams, enough to be covered by the regulations, but not allowed to be transported under 1.1.3.6, since they will be within the scope of Transport Category 2.

Many other examples could be given, but a comparison with *UN 3166 Engine, internal combustion or vehicle, flammable gas powered or vehicle, flammable liquid powered,* as well as *UN 3171 Battery- powered vehicle or Battery-powered equipment* is of relevance, since these are totally exempted from ADR/RID even though they may contain relatively large amounts of dangerous goods compared to other machinery and equipment covered by the regulations.

Safety implications

None. The amount of dangerous goods transported will at the most be the same as if the pure substance was transported under 1.1.3.6.

Feasibility

No problems are foreseen.

Enforceability

No problems are foreseen.
