Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Ninety-sixth session Geneva, 6–9 May 2014 Item 6 (b) of the provisional agenda Proposals for amendments to Annexes A and B of ADR: Miscellaneous proposals 7 April 2014

Instructions in writing

Transmitted by the International Road Transport Union

Proposal to retain the same wording for the equipment for personal and general protection as in instructions in writing

I. Situation

The decision taken on INF.19 – Belgium - by the WP.15 experts during the ninety-fifth session indicated that the Working Party considered that as personal protection equipment that must be on board vehicles was listed in section 8.1.5, it <u>was not necessary to set it out in such detail</u> in the instructions in writing, as indicated in 5.4.3.4. The Working Party adopted the amendments to 5.4.3.4 and the transitional measure proposed by the representative of Belgium.

The adopted amendment modifying the standard applicable to filters for emergency escape masks was transferred to 8.1.5.3, and the delegates of the WP15 adopted the amendments of 5.4.3.4 taking into consideration the agreed transitional measure that the instructions in writing in accordance with the requirements of ADR applicable up to 31 December 2014 (ADR 2013), but which do not however conform to the requirements of paragraph 5.4.3 applicable as from 1 January 2015, may continue to be used until 31 December 2016.

II. IRU observations

Equipment for personal and general protection

The miscellaneous equipment and equipment for personal protection are specified in numerous sections of ADR, such as 5.4.3.4 for the instructions in writing and 8.1.5 for compulsory equipment under the ADR regime.

The latest amendments aim solely to improve the understanding and interpretation of section 8.1.5 of the ADR, without improving safety and/or security.

III. IRU proposal to the WP.15

The instructions in writing are mainly aimed at the vehicle crew, and now based on the amendment made by the Contracting Parties; the last page of the instructions in writing may create confusion as they differ slightly from the text of section 8.1.5.



IRU proposes to cancel the decision made during the last WP.15 session concerning document INF 19.

IV. Justification

For IRU, sub-section 5.4.3.4 and section 8.1.5 should remain the same in both texts concerning *Equipment for personal and general protection* which is intended for vehicle crews only.

IRU agreed that the last amendment regarding the instructions in writing made by the WP.15 delegates brought no additional security and/or safety.

Updating and changing a sub-section in a disharmonised way will create discrepancies and misunderstandings for the industry.