

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

101st session

08 November 2016

Geneva, 8–11 November 2016

Item 5 (b) of the provisional agenda

**Proposals for amendments to Annexes A and B of ADR:
miscellaneous proposals**

Comments on 2016/10 – 5.4.1.1.1 (f) and carriage in accordance with 1.1.3.6

Transmitted by the Government of Romania

Introduction

1. Romania supports the principle in Sweden's proposal that goes in line with IRU principle contained in document ECE/TRANS/WP.15/2016/3 submitted at the last session of WP.15.
2. In our opinion, the alternative offered by the proposal 2b is preferable and we support it because is in line with the principle of the actual texts of the Section 3.4.1 and the Sub-section 3.5.1.1.

Proposal

3. At the last session, when discussing the documents ECE/TRANS/WP.15/2016/3 of IRU and informal document INF.24 of Sweden, we asked a question and made a verbal proposal to simplify the added text imposed by the **NOTE 1** of 5.4.1.1.1 (f).
4. We propose a simplified version of the text in **NOTE 1** of 2016/10 by deleting “*for each transport category*”, as follows:
“NOTE 1: In the case of intended application of 1.1.3.6, the total quantity and calculated value of dangerous goods ~~for each transport category~~ shall be indicated in the transport document ~~in accordance with 1.1.3.6.3 (see 1.1.3.6.2 and 1.1.3.6.4).”~~
5. In this way, a driver carrying different dangerous goods on different transport documents will check only the total of calculated values between documents (one value per transport document).
6. Currently the text of **NOTE 1** imposes an elaborated text for the transport document that has a minor benefit. We consider the dispatcher or the safety adviser of the carrier must check the sum of the calculated values for each consignment and for the total load of the cargo transport unit before confirming the received orders. Our intention is to simplify at least the obligations of the driver.
7. Here we must see the clear distinction between driver and safety adviser obligations. Even **8.2.2.3 Structure of training** does not contain the subject of the **Exemptions related to quantities carried per transport unit**. We talk here about a driver that is not the holder of an ADR training certificate.

Consequential amendment

8. If the simplified version of the *Note 1*, as suggested above, is adopted, the example of **Proposal 5** of ECE/TRANS/WP.15/2016/10 becomes useless.

9. **Correction**

10. The text of the footnote *) in proposal 2b has changed the sense of the provision of 1.1.3.6.2, first indent. For this reason the text must be arranged by deleting the word “except”, as follows:

*) Chapter 1.10 only applies to explosive substances and articles of UN 0029, 0030, 0059, 0065, 0073, 0104, 0237, 0255, 0267, 0288, 0289, 0290, 0360, 0361, 0364, 0365, 0366, 0439, 0440, 0441, 0455, 0456 and 0500 and ~~except~~ for Class 7 excepted packages of UN Nos. 2910 and 2911 if the activity level exceeds the A2 value.”
