

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

106th session

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Item 6 (b) of the provisional agenda:

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

Comments on 2019/7: Marking of transport units and containers loaded with limited quantities

Transmitted by the Government of Sweden

1. Sweden agrees with the problem raised in Switzerland's document 2019/7, and supports the principle to always require the LQ mark for carriage in containers above the limits stated in section 3.4.13. However, we cannot see that amending the second paragraph in 3.4.13 (b) solves the problem.
2. Section 3.4.13 (b) refers to marking in accordance with 3.4.15, which is the LQ marking. Subsequently, the exemption allowed in the second paragraph in 3.4.13 (b) refers to the LQ marking and not the placarding. What further supports this interpretation is that a placard is never referred to as a mark, or affixed at the front of a transport unit – and the second paragraph states that “the same marks shall be affixed at the front and at the rear of the transport unit”. We also believe that sub-section 5.3.1.3 already exempts the carrying vehicle from having placards if the placards affixed to the containers, bulk containers, MEGCs, tank-containers or portable tanks are not visible from the outside.
3. As shown in example 2 in the table in Switzerland's document (2019/7), it is the provisions for the fully regulated goods that take precedence and determines what kind of information that should be displayed on the container, and not necessarily the actual and more relevant hazard. This poses a problem. The risk for people and the environment of e.g. a drum containing 60 kg of an environmentally hazardous substance of class 9 (carried as fully regulated dg and not LQ), should not be so crucial that it takes precedence in terms of how to display the hazard on a container also containing 8 tonnes of e.g. acetone packed in limited quantities.
4. For transport units containing dangerous goods packed in limited quantities, the situation is slightly different. In this case the LQ marks may be dispensed with when the transport unit also contains dangerous goods for which the marking with orange-coloured plates in accordance with 5.3.2 is required. However, since the orange-coloured plates already reflect that the load might consist of different types of dangerous goods, the need to also affix the LQ marks would be redundant.

Proposal

5. Amend 3.4.13 (b) as follows (changes underlined or ~~stricken through~~):
 - “(b) Containers carrying dangerous goods packed in limited quantities, on transport units with a maximum mass exceeding 12 tonnes, shall be marked in accordance with 3.4.15 on all four sides, except when the container contains other dangerous goods for which placarding in accordance with 5.3.1 is required. ~~In this latter case, the container may shall~~ display the required placards only, or both the placards in accordance with 5.3.1 and the marks in accordance with 3.4.15.

The carrying transport unit need not be marked, except when the marks affixed to the containers are not visible from outside this carrying transport unit. In this latter case, the same marks shall be affixed at the front and at the rear of the transport unit.”