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**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods**

Bern, 18–22 March 2019

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:  
new proposals****Proposal of amendments related to the terms “risk” and  
“hazard/danger” in the context of RID/ADR/ADN****Transmitted by the Government of Romania \****Summary*

- Executive summary:** Proposal to complete the amendments included in documents ECE/TRANS/WP.15/AC.1/2017/26 /OTIF/RID/RC/2017/26 – Report of the April 2017 Ad Hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods.
- Action to be taken:** Adopt the proposed amendments for a harmonised use of the terms “risk” and “hazard/danger”.
- Related documents:** Informal document INF.4 of the September 2017 session of The Joint Meeting ECE/TRANS/WP.15/AC.1/148, paragraphs 39 to 42.  
Informal document INF.13 of the March 2018 session of The Joint Meeting and ECE/TRANS/WP.15/AC.1/150, paragraphs 58 to 61.  
Informal document INF.10 of the September 2018 session of The Joint Meeting ECE/TRANS/WP.15/AC.1/152, paragraphs 47 to 50.

\* In accordance with the programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/WP.15/237, annex V, (9.2)).

## Introduction

1. This document aims to continue the harmonisation of the use of the terms “risk” and “hazard/danger” in the context of RID/ADR/ADN.
2. As a continuation of the activity of the Ad Hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations the Informal Working Group established in September 2017 met twice, according to the terms of reference set up by the Joint Meeting. The two sessions were held:
  - (a) in Valenciennes, France, from 15 to 16 January 2018 at the headquarters of the European Union Agency for Railways (ERA) and;
  - (b) in Hague, the Netherlands, from 11 to 13 June 2018 at the headquarters of the Ministry of Infrastructure and Water Management to draft definitions of the concepts of “risk” and “hazard/danger” in the context of RID/ADR/ADN. The group also prepared proposals of amendments for the harmonisation of the use of the terms for the application of the Model Regulations and the Globally Harmonised System of Classification and Labelling of Chemicals (GHS).
3. The present document is a synthesis of the proposals detailed in the last report of the Group (see INF.10 and Add.1-2 of the September 2018 session of the Joint Meeting), aiming to:
  - (a) avoid the use of danger, hazard and risk, when not necessary;
  - (b) replace “risk” with “likelihood” as specified also in paragraph 1.1.2.6.2.1 of the GHS (*“The concept of risk or the likelihood of harm occurring, and subsequently communication of that information, is introduced when exposure is considered in conjunction with the data regarding potential hazards. The basic approach to risk assessment is characterized by the simple formula: HAZARD X EXPOSURE = RISK”*),
  - (c) replace the term “risk” with “hazard” where appropriate, for the harmonisation of the use of these concepts in the official languages (English, French and German).
4. As mentioned at the last session of the Joint Meeting by the representative of Romania, we add a proposal for paragraph 2.2.8.1.7 (to align the English version to the French and German versions) in an area where RID/ADR/ADN texts complement the provisions taken from the Model Regulations.
5. The proposed amendments in informal document INF.10 and Add.1-2 were reanalysed in the context of RID/ADR/ADN and three proposals were updated accordingly:
  - (a) amendment 23: the 2019 edition of TU 35 in German version changed in the 2019 edition and the proposal remains relevant only for the French version of RID/ADR;
  - (b) amendment 72: The provisions of V8 of 7.2.4 of ADR have been transferred to 7.1.7 and 3-R3 was included in 7.1.7.4.5 c). The German version of the 2019 edition already contains the wording "eine Entzündung". The proposal is relevant only for the French version.
  - (c) amendment 73): The provisions of V8 of 7.2.4 of ADR have been transferred to 7.1.7 and 3-R5 was included in 7.1.7.4.5 e) iii). The German version of the 2019 edition already contains the wording "eine Entzündung". The proposal is relevant only for the French version.

6. A transitional period of 2 (two) years for the implementation of the amendments to the 5.4.3.1 (Instructions in writing) is proposed in order to respond to the request “not to modify them too frequently”. For the instructions in writing according to ADR, this transitional measure will cover also another draft amendment submitted by Germany to the next session of WP.15. If the proposals are adopted for the 2021 editions of RID/ADR/ADN, with a transitional period of 2 (two) years for the amendments related to the instructions in writing, we will set up the longest period of stability in the use of the Instructions in writing (from 1 January 2017 to 30 June 2023) since the implementation of the new form (e.g. 2009 for ADR).

7. The proposals below cover only those parts of RID/ADR/ADN where differences exist in using the terms "danger/hazard" and "risk" between the official languages.

8. After the adoption of these proposals of amendments the other parts of RID/ADR/ADN where the different language versions use the same term ("danger/hazard" or "risk") must be analysed too. This will be the activity of the next meeting of the Informal Working Group which will take place in The Hague from 11 to 13 June 2019. Delegations interested in participating in the work of the informal group are invited to contact the representative of Romania.

## Proposals

### Proposal 1

9. Amend RID/ADR/ADN as follows:

#### Chapter 1.3

1.3.2.3 Replace by "The personnel shall be trained in the hazards presented by dangerous goods, taking into account possible injuries or exposures arising from an incident involving the carriage of dangerous goods, including loading and unloading".

#### Chapter 1.8

(ADN)

1.8.1.4.3 Replace "constitute a safety hazard" by "jeopardise the safety".

(RID/ADR/ADN)

1.8.5.3 Replace "an imminent risk" by "such a likelihood".

1.8.5.3 para. 4 Replace "risk" by "danger".

1.8.5.4 Replace "risk" by "danger".

1.8.5.8 Replace "risk" by "danger".

#### Chapter 2.2

2.2.8.1.7 Replace "categories of risk different" by "different hazard categories".

#### Chapter 4.3

(ADR/RID)

4.3.2.2.1 (a) Replace "additional hazards " by " other subsidiary hazards".

**Chapter 5.3**

- 5.3.2.3.1 figure 6 Replace "risk of infection" by "infection hazard".
- 5.3.2.3.1 figure 9 Replace "Risk of spontaneous violent reaction" by "spontaneous violent reaction hazard".
- 5.3.2.3.1 Note 1 Replace by “Spontaneous violent reaction within the meaning of figure 9 include the possibility, following from the nature of a substance, of explosion, disintegration or polymerization reaction following the release of considerable heat or flammable and/or toxic gases.”.

**Chapter 5.4**

## 5.4.3.4

- label 1.4 Replace "Slight risk of explosion and fire" by "May cause explosion and fire".
- label 2.1 Replace "Risk of fire" by "May cause fire", replace "Risk of explosion" by "May cause explosion" and replace "Risk of asphyxiation" by "May cause asphyxiation".
- label 2.2 Replace "Risk of asphyxiation" by "May cause asphyxiation".
- label 2.3 Replace "Risk of intoxication" by "May cause intoxication".
- label 3 Replace "Risk of fire" by "May cause fire" and replace "Risk of explosion" by "May cause explosion".
- label 4.1 Replace "Risk of fire" by "May cause fire" and replace "Risk of explosion of desensitized explosives after loss of desensitizer" by "Desensitized explosives may explode after loss of desensitizer".
- label 4.2 Replace "Risk of" by "May cause".
- label 4.3 Replace "Risk of" by "May cause".
- label 5.1 Replace "Risk of" by "May cause".
- label 5.2 Replace "Risk of" by "May cause".
- label 6.1 Replace "Risk of" by "May cause" in the first phrase and "Risk" by "Hazardous" in the second phrase.
- label 6.2 Replace "Risk of" by "May cause" in the first phrase and "Risk" by "Hazardous" in the third phrase.
- labels 7A, B, C, D Replace "Risk " by " Hazard".
- label 7E Replace "Risk of" by "May cause".
- label 8 Replace "Risk of" by "May cause" in the first phrase and "Risk" by "Hazardous" in the fourth phrase.
- labels 9, 9A Replace "Risk of" by "May cause" in the first three phrases and "Risk" by "Hazardous" in the fourth phrase.
- mark Environmentally hazardous substances Replace "Risk" by "Hazardous".
- mark Elevated temperature substances Replace "Risk of" by "May cause".
- In the header of the last table Replace "Mark" by "Marks".

- Note 1                      Replace "risks" by "hazards".  
(ADN)
- 5.4.3.4 Note 3              Replace "risks" by "hazards".
- Chapter 6.8**  
(ADR/RID)
- 6.8.2.2.1 to 6.8.2.2.1.4              Replace "the risk of damage" by "damages".
- 6.8.2.2.2                      Delete "the danger of".
- 6.8.3.2.20 para. 2              Replace "the risk of damage" by "damages".  
(RID)
- 6.8.4 TE25 a - 10              Replace "the risk of" by "the likelihood of".
- 6.8.4 TE25 c                      Delete "risk of".
- 6.8.4 TE25 a (last indent)              Replace "the risk of" by "the likelihood of".
- 6.8.4 TE25 d                      Replace "the possibility of" by "the likelihood of".
- 6.8.4 TE25 e                      Replace "the possibility of" by "the likelihood of".
- 6.8.5.1.1 b 1                      Replace "there is no risk of corrosion due to stress cracking" by "the corrosion due to stress cracking can be excluded".
- Chapter 6.10**  
(ADR/RID)
- 6.10.3.7 (a)                      Delete "the danger of".
- Chapter 7.1**  
(ADN)
- 7.1.4.3.4 2/                      Replace "additional risk" by "additional hazard" and delete hazard at the end of the phrase.
- 7.1.4.4.4 (b) para. 4              Replace "additional" by "subsidiary".
- 7.1.4.4.4 (b) para. 5              Replace "additional" by "subsidiary".
- 7.1.4.4.4 (b) para. 6              Replace "additional" by "subsidiary".
- 7.1.4.75 Title                      Replace "risk of sparkling" by "spark formation".
- Chapter 7.2**  
(ADN)
- 7.2.3.42.1                      Delete "there is risk of solidification of" and introduce "may solidify" after "cargo".
- 7.2.4.77 \*\*                      Replace "risk" by "possibility".
- Chapter 7.5**  
(ADR/RID)
- 7.5.2.2 (b)                      Replace "hazard division" by "division".
- Chapter 9.2**  
(ADR)

9.2.1.1 in table at 9.2.4 Delete "RISKS".

9.2.4 Delete "risk".

### **Chapter 9.3**

(ADR)

9.3.3 Replace "from external hazards" by "by hazards from external sources".

9.3.4.1 Replace "from external hazards" by "by hazards from external sources".

9.6.1 (d) Replace "if there is any risk of a dangerous excess pressure arising therein" by "if dangerous excess pressure may arise therein".

### **Proposal 2**

10. Add the following new transitional measure:

“1.6.1.XX The instructions in writing in accordance with the requirements of RID/ADR/ADN applicable up to 31 December 2020, but which do not however conform to the requirements of 5.4.3 applicable as from 1 January 2021, may continue to be used until 30 June 2023.”.

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