



**Brancheorganisation for
den danske vejgodstransport**

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ITD – brancheorganisationen for den danske vejgodstransport har modtaget ovennævnte høringsmateriale i høring og har følgende bemærkninger.

ECE/TRANS/WP.15/AC.1/2014/43

Østrig og Spanien foreslår ændringer til afsnit 5.5.3 og tabel A i kapitel 3.2 i RID/ADR om transport af tøris. Ændringerne vedrører især sikring af, at tøris enten transporteres i vel-ventilerede køretøjer og containere, eller at der ikke kan ske udveksling af gas mellem lastrum og førerkabine. Det foreslås også, at der skal gælde samme vilkår (afsnit 5.5.3) for tøris, der transporteres som last, som for tøris, der anvendes til køling eller konditionering. Vær opmærksom på, at afsnit 5.5.3 i 2015-udgaven af RID/ADR i forvejen er vedtaget ændret i forhold til 2013-udgaven, jf. følgende ændringsdokument og korrektion til ændringsdokument.

ITD finder det fornuftigt, at forsendelser af UN 1845 Tøris i ikke-isolerede eller ikke ventilerede køretøjer underlægges de relevante bestemmelser i 5.5.3.

ECE/TRANS/WP.15/AC.1/2014/44

Belgien og Holland ønsker fortsatte drøftelser af, om formålet med ulykkesrapportering i henhold til afsnit 1.8.5 i RID/ADR skal udvides, så ulykkesrapportering skal ske også med det formål at understøtte statistiske analyser og risikoanalyser. De ønsker drøftet, om form og indhold af den nuværende model for rapportering, jf. punkt 1.8.5.4 i RID/ADR, skal ændres (digital form, yderligere indhold), og om der skal forlanges rapportering i flere tilfælde end de i punkt 1.8.5.3 nævnte.

Drøftelser fra fællesmødet i marts 2014 fremgår af referatet fra mødet (punkt 49-53).

ITD mener, at formålet med rapportering jf. 1.8.5 med fordel kunne tydeliggøres og evt. udvides. Hvis ikke formålet står klart for virksomheder og myndighederne, og der ikke kommer et synligt og brugbart output af rapporterne, synes bestemmelsen alene at være en administrativ byrde, der ikke nødvendigvis resulterer i større national eller international sikkerhed.

Hvis ADR-konventionen klart definerer formålet med rapporteringen, og myndighederne har et klart og fælles mål for øje, er der større sandsynlighed for at rapporteringerne kommer myndigheder og virksomheder til gavn.



ITD mener, at målet med rapporteringen bør være risikoanalyser, og deraf afledte vejledninger på internettet til nationalt og internationalt brug på virksomheds- og myndighedsniveau. Dette kan som udgangspunkt bidrage til større sikkerhed nationalt og internationalt.

ITD finder det naturligt at arbejder hen imod elektronisk indberetning og elektronisk databehandling. Indrapportering via papirblanketter eller Word formularer synes utidssvarende og ressourcetungt efterfølgende at bearbejde, analysere og transformere til brugbar information til virksomheder og myndigheder.

ECE/TRANS/WP.15/AC.1/2014/47

Polen ønsker fællesmødets vurdering af, om kuls klassificering som farligt gods skal drøftes på UN-Subcommittee-niveau. Der er til RID og ADN, men ikke til ADR, vedtaget særlige be-stemmelser for transport af hårdt kul mv. (gældende for UN 1361 Kulstof eller Kønrøg og UN 3088 Selvopvarmende organisk fast stof, n.o.s.). Polen peger på, at der således fra 2015 bl.a. er udfordringer ved multimodal transport.

ITD finder det naturligt, at der er overensstemmelse mellem transport af kul på bane og ad vej.

Øvrige forslag

IRU- den internationale vognmandsorganisation har sendt følgende forslag til medlemmerne af *IRU Group of Experts on the Transport of Dangerous Goods (GEMD)*:

EXEMPTIONS RELATED TO QUANTITIES CARRIED PER TRANSPORT UNIT

GEMD/GE2659/JMA

Proposal to amend the sub-section 1.1.3.6.3 table taking the Class instead of the transport category

Se vedhæftet fil.

ITD er enig i, at det kan gøres lettere og mere overskueligt, hvornår et produkt kan transporteres under frimængdereglerne. IRU's forslag om, at arrangere tabellen efter klasse i stedet for efter transportkategori i ADR 2015 er en mulighed. Den nuværende tabel 1.1.3.6.3 i ADR 2013 kunne evt. udvides med en kolonne med multiplikationsfaktoren.

ITD foreslår dog en anden løsning: at tilføjet det enkelte UN-nummers frimængde i kilo eller liter direkte i Tabel 3.2. A i kolonne 15. Med denne løsning kan en disponent hurtigt slå op og efterkontrollere, om en transport af farligt gods skal udføres af en chauffør med eller uden ADR-bevis (men med en kap. 1.3. uddannelse) og med eller uden ADR-udstyr mm.

En chauffør kan ligeledes hurtigt efterkontrollere, om han må udføre transporten efter frimængdereglerne, og om han har de rette dokumenter og udstyr med, når afsender i overensstemmelse med 5.4.1.1.1 (F) anm. 1, har anført transportkategorien og den samlede mængde farligt gods i den pågældende transportkategori i transportdokumentet, fordi afsender påtænker at anvende 1.1.3.6.

ITD mener, at angivelse af frimængde direkte i stoflisten, kan gøre det lettere at overholde reglerne om transport af farligt gods, give udsalg i færre overtrædelser og i højere sikkerhed.



LIMITED QUANTITIES - PROPOSAL TO AMEND SECTION 3.4.12 GEMD/GE2757/JMA

Proposal to amend Section 3.4.12 regarding the transport of limited quantities

ITD støtter nedenstående forslag fra IRU om, at afsender, ud over bruttomængden, også på en sporbar måde skal oplyse godsets "natur", når han sender farligt gods emballeret som begrænsede mængder.

"3.4.12 In advance of carriage, consignors of dangerous goods packed in limited quantities shall inform the carrier in a traceable form of the total gross mass and the nature of the product of such goods to be consigned."

ITD foreslår i den forbindelse, at ordet "nature" evt. erstattes med eller suppleres med ordet "risk" ("nature and risk of the product") for at sikre, at det står klart for både afsender, transportør eller chauffør hvilke risici, der er forbundet med transport af det pågældende produkt.

Ordene "nature" eller "risk" bør i så fald defineres.

Med venlig hilsen

ITD

Camilla Wiig
Specialkonsulent

GEMD/GE2659/JMA

Geneva, 19 June 2014

EXEMPTIONS RELATED TO QUANTITIES CARRIED PER TRANSPORT UNIT

Item VIII. of the Provisional Agenda of the IRU Group of Experts on the Transport of Dangerous Goods (GEMD) meeting to be held on 11 September 2014 in Constanta

Proposal to amend the sub-section 1.1.3.6.3 table taking the Class instead of the transport category

I. SITUATION

All dangerous goods are assigned to a transport category (0, 1, 2, 3 or 4) as indicated in Column (15) of Table A of Chapter 3.2.

Dangerous goods of category 0 and empty uncleaned packagings having contained these goods cannot be transported in the framework of the free boundary.

The maximum quantities per transport unit are established as follows:

Transport category	Quantity
0	0
1	20
<i>* For UN Nos. 0081, 0082, 0084, 0241, 0331, 0332, 0482, 1005 and 1017, the total maximum quantity per transport unit shall be</i>	50
2	333
3	1000
4	unlimited

The transport under exemption related to quantities carried per transport unit is limited to 1000.

When the sum exceeds 1000, it is necessary to comply with all the requirements of the ADR.

II. EXEMPTIONS RELATED TO QUANTITIES CARRIED PER TRANSPORT UNIT – FREE BOUNDARY

ADR 2015 states requirements for *Exemptions related to quantities carried per transport unit* based on the following sub-sections:

- a) 1.1.3.6.1
- b) 1.1.3.6.2

c) 1.1.3.6.3

Table where the maximum total quantity per transport unit can be calculated.

"maximum total quantity per transport unit" means:

- For articles, gross mass in kilograms (for articles of Class 1, net mass in kilograms of the explosive substance; for dangerous goods in machinery and equipment specified in this Annex, the total quantity of dangerous goods contained therein in kilograms or litres as appropriate);
- For solids, liquefied gases, refrigerated liquefied gases and dissolved gases, net mass in kilograms;
- For liquids, the total quantity of dangerous goods contained in litres;
- For compressed gases and chemicals under pressure, the water capacity of the receptacle in litres.

d) 1.1.3.6.4

Where dangerous goods of different transport categories are carried in the same transport unit, the sum of:

- The quantity of substances and articles of transport category 1 multiplied by "50" – except for substances where the total maximum quantity per transport unit shall be 50kg - *UN Nos. 0081, 0082, 0084, 0241, 0331, 0332, 0482, 1005 and 1017*;
- The quantity of substances and articles of transport category 1 referred to in Note a to the table in 1.1.3.6.3 multiplied by "20";
- The quantity of substances and articles of transport category 2 multiplied by "3"; and
- The quantity of substances and articles of transport category 3;

shall not exceed "1 000".

III. PROPOSAL TO AMEND THE TABLE IN 1.1.3.6

a) Delete the table in 1.1.3.6.3 and start with: "Maximum total quantity per transport unit" means:

b) Introduce the table below in 1.1.3.6.5, and the sub-section shall read:

1.1.3.6.5 Where the dangerous goods carried in the transport unit belong to the same Class, the maximum total quantity per transport unit is indicated in column (4) of the table below:

1	2	3	4	5
Class	Substance or articles packing group or classification code/group or UN No.	Transport category	Maximum total quantity per transport unit	Factor
1	1.1A, 1.1L, 1.2L, 1.3L and UN No. 0190 and empty uncleaned packagings, except those classified under UN No. 2908, having contained substances classified in this transport category	0	0	-
	1.1B to 1.1J (without UN Nos. 0081, 0082, 0084 and 0241), 1.2B to 1.2J, 1.3C, 1.3G, 1.3H, 1.3J and 1.5D (without UN Nos. 0331, 0332 and 0482)	1	20	50
	UN Nos. 0081, 0082, 0084, 0241, 0331, 0332 and 0482	1	50	20
	1.4B to 1.4 G and 1.6 N	2	333	3
	1.4S	4	unlimited	0

2	Groups C, CO, FC, T, TC (without UN No. 1005), TO, TF, TOC (without 1017), TFC	1	20	50
	Group F	2	333	3
	Groups A and O	3	1000	1
	UN Nos. 1005 and 1017	1	50	20
3	UN No 3343 as well as empty uncleaned packagings having contained the aforementioned substance.	0	0	-
	Substances or articles belonging to packing group I	1	20	50
	Substances or articles belonging to packing group II	2	333	3
	Substances or articles belonging to packing group III and UN No. 3473	3	1000	1
4.1	UN Nos. 3221 to 3224 and UN Nos. 3231 to 3240 as well as substances or articles belonging to packing group I	1	20	50
	UN Nos. 3225 to 3239 as well as substances or articles belonging to packing group II and not classified in transport category 4	2	333	3
	Substances or articles belonging to packing group III and not classified in transport category 4	3	1000	1
	UN Nos.1331, 1345, 1944, 1945, 2254 and 2623	4	unlimited	0
4.2	Substances belonging to packing group I, as well as empty uncleaned packagings having contained aforementioned substances.	0	0	-
	Substances or articles belonging to packing group II	2	333	3
	Substances or articles belonging to packing group III and not classified in transport category 4	3	1000	1
	UN Nos.1361 and 1362 belonging to packing group III	4	unlimited	0
4.3	UN Nos. 1183,1242,1295, 1340, 1390, 1403, 1928, 2813, 2965, 2968, 2988, 3129, 3130, 3131, 3134, 3148, 3396, 3398 and 3399 as well as empty uncleaned packagings having contained aforementioned substances.	0	0	-
	Substances or articles belonging to packing group I and not classified in transport category 0	1	20	50
	Substances or articles belonging to packing group II and not classified in transport category 0	2	333	3
	Substances or articles belonging to packing group III and not classified in transport category 0, and UN No 3476	3	1000	1
5.1	UN No 2426	0	0	-
	Substances or articles belonging to packing group I	1	20	50
	Substances or articles belonging to packing group II	2	333	3
	Substances or articles belonging to packing group III	3	1000	1
5.2	UN Nos. 3101 to 3104 and 3111 to 3120	1	20	50
	UN Nos. 3105 to 3110	2	333	3
6.1	UN Nos. 1051, 1600, 1613, 1614, 2312, 3250 and 3294 as well as empty uncleaned packagings having contained aforementioned substances	0	0	-
	Substances or articles belonging to packing group I and not classified in transport category 0	1	20	50

	Substances or articles belonging to packing group II or III	2	333	3
6.2	UN Nos. 2814 and 2900 as well as empty uncleaned packagings having contained aforementioned substances.	0	0	-
	UN No. 3291	1	20	50
	UN No. 3373	2	333	3
7	UN Nos. 2912 to 2919, 2977, 2978 and 3321 to 3333 and empty uncleaned packagings, except those classified under UN No. 2908, having contained substances classified in this transport category.	0	0	-
	UN Nos. 2908 to 2911	4	unlimited	0
8	UN Nos. 2215 (MALEIC ANHYDRIDE, MOLTEN)	0	0	-
	Substances or articles belonging to packing group I	1	20	50
	Substances or articles belonging to packing group II	2	333	3
	Substances or articles belonging to packing group III and substances UN Nos. 2794, 2795, 2800, 3028 and 3477	3	1000	1
9	UN Nos. 2315, 3151, 3152 and 3432 and apparatus containing such substances or mixtures as well as empty uncleaned packagings having contained aforementioned substances	0	0	-
	UN No. 3245 and substances or articles belonging to packing group II and not classified to category 0	2	333	3
	UN Nos. 2990 and 3072 and substances or articles belonging to packing group III	3	1000	1
	UN Nos. 3268 and 3499	4	unlimited	0

c) Renumber 1.1.3.6.5 to 1.1.3.6.6

IV. EXAMPLES USING THE AMENDED TABLE VERSUS THE CURRENT TABLE IN SUB-SECTION 1.1.3.6

1. Where the dangerous goods carried in the transport unit belong to the same category

a) UN 3473 FUEL CELL CARTRIDGES or FUEL CELL CARTRIDGES CONTAINED IN EQUIPMENT or FUEL CELL CARTRIDGES PACKED WITH EQUIPMENT containing flammable liquids

The information based on the transport document; indicates 3 boxes of UN3473 Fuel Cell Cartridges, 3, (E), total 250 litres.

Today to calculate the *exemptions related to quantities carried per transport unit*, the consignor or the driver must look at the table 3.2 A of the ADR; column 15, transport category, then he must open the table of sub-section 1.1.3.6.3 to see if the UN3473 is exempted or not.

With the proposed table to amend sub-section 1.1.3.6, the consignor or the driver can take class 3, immediately see the line where UN 3473 is listed, and find out that the exemption is up to 1000 litres.

b) UN 1600 DINITROTOLUENES, MOLTEN:

The information based on the transport document; indicates UN 1600; Class 6.1; packing group II.

The consignor or the driver can see immediately in above table that UN 1600, Class 6.1 first line, has no exemption.

- c) UN 1331 MATCHES, 'STRIKE ANYWHERE': hazard label 4.1 respectively class 4.1; packaging group III.

The consignor or the driver can immediately see on the fourth line of Class 4.1 that the quantity per transport unit is unlimited.

- The driver can pass through all tunnels and does not have to have an ADR certificate or to mark the transport unit.

2. Where dangerous goods of different transport categories are carried in the same transport unit

- a) Mixed load: UN 1747 BUTYLTRICHLOROSILANE, 8, packing group II, D/E, total 200 litres and UN 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., 9, packing group III, (E), total 300 litres.

- The consignor or the driver needs to check for UN 1747 in the new proposed table under Class 8, to find a coefficient 3 which, multiplied by 200 = 600, then
- The consignor or the driver checks UN 3082, Class 9, third line, to find a coefficient factor of 1, which makes a total of 300.
- The addition makes a sum of 900, i.e. below the 1000 limit for exemption.

- The driver can pass through all tunnels and does not have to have an ADR certificate or to mark the transport unit.

V. IRU OBSERVATIONS

The above table would simplify sub-section 1.1.3.6.3 by having at once all the necessary information to calculate the “maximum quantity per transport unit”, which would ease the work and understanding of consignors, drivers and help training institutes.

VI. NEXT STEP

Members are invited to carefully examine this document and to send their comments and suggestions in writing to the [IRU Secretariat General](#) by no later than 15 August 2014.

This item will feature on the Provisional Agenda of the next IRU Group of Experts on the Transport of Dangerous Goods (GEMD) meeting on 11 September 2014 for decision and to devise an action plan on how to proceed in order to implement it as part of ADR 2017.

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