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INLAND TRANSPORT COMMITTEE

Working Party on the Transport
of Dangerous Goods
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PROPOSALS OF AMENDMENTS TO ANNEXES A AND B OF ADR

Sub-section 1.1.3.6 ADR

Exemptions related to quantities carried per transport unit

Submitted by the Government of Germany

SUMMARY

Executive Summary:	The purpose is to amend the exemptions related to quantities carried per transport unit.
Action to be taken:	In paragraph 1.1.3.6.2: delete “- Chapter 1.3;”, add to “- Part 8 except for ...” “8.2.3”
Related documents:	See also INF.3 (71 st session)

Introduction

According to the current wording, persons involved in the carriage of dangerous goods on vehicles with a permissible maximum mass of not more than 3.5 tons and / or in quantities not exceeding the limits given in the table in paragraph 1.1.3.6.3 are not required to undergo training in accordance with chapter 1.3 and / or section 8.2.3.

Proposal

In paragraph 1.1.3.6.2: delete “- Chapter 1.3;”, add to “- Part 8 except for ...” “8.2.3”

Justification

Dangerous goods are, to an increasing extent, carried in smaller quantities below the limits indicated in the table in paragraph 1.1.3.6.3 on vehicles with a permissible maximum mass of not more than 3.5 tons and / or quantities below certain limits (see 1.1.3.6.3). Drivers employed in these transport operations are not required to receive training in accordance with section 8.2.1; they should, however, at least receive training in accordance with Chapter 1.3 since, after all, the goods carried are dangerous goods.

Moreover, as a result of this amendment the requirement in the last sentence of section 8.2.3 would make sense. This text expressly requires also those vehicle drivers to undergo training to whom the requirements concerning the training of the vehicle crew according to section 8.2.1 do not apply.

But undergoing training is not only an important safety issue for the drivers. Other persons employed by participants referred to in Chapter 1.4 must receive training too, appropriate to the responsibilities and duties of the individual. In any case also these persons are working with dangerous goods and proper handling of dangerous goods will be useful for the safety in the enterprise and the economical development as well.

Safety implications

The amendment improves safety and ensures that a level of safety, which relates appropriate to the kind and amount of dangerous goods handled and carried, will be reached.

Feasibility

As any employer offers internal training for his personnel, at least for company procedures, an opportunity is available for the training requested.
