UNITED NATIONS



Economic and Social Council

Distr. GENERAL

TRANS/WP.15/2004/37 24 February 2004

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods (Seventy-sixth session, agenda item 5, Geneva, 3-7 May 2004)

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Comments on the proposal from Denmark in TRANS/WP.15/2004/6 on the Information required in the transport document according to the NOTE under 5.4.1.1.1 (f)

Transmitted by the Government of Sweden

Sweden welcomes the proposal from Denmark. We also believe that one single principle should be applied. Always having a calculated value along the same principle would certainly ease the burden for the driver, in particular when picking up dangerous goods from different consignors.

However, we believe that keeping the words "total quantity" could be misleading since this is intimately connected to 1.1.3.6.3 and the table. Also the calculated value for transport categories other than transport category 3 does not correspond to a real "quantity". Moreover, in 1.1.3.6.4 it is clearly stated that the value calculated represents a sum so we suggest deleting "total quantity" and rearranging the text slightly as shown below.

We also believe that there is a need to stress that this calculation principle should be applied even when there is only one transport category in the transport document and suggest an additional sentence to this effect as follows.

Proposal

Amend the text in the NOTE under 5.4.1.1.1 (f) to read:

"NOTE:In the case of intended application of 1.1.3.6 a value calculated in accordance with the principles set out in 1.1.3.6.4 shall be indicated in the transport document. This principle shall also apply when the dangerous goods covered by the transport document represent only one transport category."