

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Seventy-eight session, agenda item 6 (a),
Geneva, 9-12 May 2005)

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Comments of Belgium to document TRANS/WP.15/2005/13

Comments

Belgium can agree with the principle of the United Kingdom proposal. The text itself, however, gives rise to the following objections:

1. The wording “may open a package containing dangerous goods” allows much more than what is really needed. This operation should never result in free dangerous goods, in direct contact with the surroundings and is therefore to be restricted to outer packagings of combination packagings.
2. The wording “For classes 1 - 6, 8 and 9” is not very clear, nor correct (class 6 does not exist).

It was obviously the intention only to exclude packagings containing class 7 products. But is it acceptable to allow the (partial) opening of packagings containing dangerous goods of class 1, 5.2, 6.2 or desensitised explosives ? And, on the other hand, is there a real need to do so?

3. As a consequence of this proposal, “a driver’s assistant” in 8.3.3 ought to be replaced with “any other member of the crew” to avoid unnecessary confusion.
4. From the editorial point of view, there is a contradiction between the first sentence of the proposed texts and the second one. Although this is not wrong, it is better to avoid it.

Proposal

Change 7.5.7.3 and 8.3.3 as follows :

- 7.5.7.3 If the carrier has authorized him to do so in writing, the driver or any other member of the crew may open an outer packaging of a combination packaging containing dangerous goods of [class 1, 2, 3, 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8 and/or 9]; in all other cases, he may not open a package containing dangerous goods.

8.3.3 Prohibition on opening packages

If the carrier has authorized him to do so in writing, the driver or any other member of the crew may open an outer packaging of a combination packaging containing dangerous goods of [class 1, 2, 3, 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8 and/or 9]; in all other cases, he may not open a package containing dangerous goods.
