

**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods  
(Geneva, 5-9 November 2007)

Agenda item 5 (a)

**PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR**

Comments to document ECE/TRANS/WP.15/2007/25 from Germany

Transmitted by the Government of Belgium

1. An action to be taken in the event of an accident or emergency is :
  - *Move away from the vicinity of the accident or emergency, advise other persons to move away and follow the advice of the emergency services ;*The shovel, drain seal and collecting container are of no use to someone who is not in the vicinity of the accident or emergency. Why then are they to be carried on board of a vehicle when substances of class 3, 4.1, 8 and/or 9 are being transported ?

Proposal : eliminate the last three rows of the table with the equipment for personal and general protection.
2. For danger labels 2.1, 2.2, 2.3 and 3, the table with additional guidance to vehicle crews gives “*Take cover*” as first or second additional guidance in column (3). When leakage of toxic or flammable gases occurs, this is the worst possible advice to give. The crew should get away as fast as possible, in the direction of the wind.

Proposal : eliminate “Take cover” ; if this is not accepted, replace “Take cover” with “Take cover at a safe distance”
3. For danger label 3, the table with additional guidance to vehicle crews contains a contradiction in column (3) : whilst taking cover, the crew has to prevent leaking substances from running into the aquatic environment or the sewage system. Moreover, both of these additional guidances contradict the actions in the event of an accident or emergency (move away from the vicinity).

Proposals : replace “Take cover” with “Take cover at a safe distance”

remove “Prevent leaking substances from running into the aquatic environment or the sewage system.”
4. For danger labels 4.1, 4.3, 5.1, 5.2 and 8, the additional guidance in column (3) of the table contradicts the actions in the event of an accident or emergency (move away from the vicinity).

Proposal : remove the additional guidance, given in column (3).
5. In the table giving the equipment for personal and general protection, an emergency escape mask is required for danger label number 2.1, but only in combination with label number 6.1 (this combination only occurs in the case of aerosols of UN 1950). The following problems are related to this requirement :
  - for danger label 2.1, the table with additional guidance to vehicle crews mentions the use of the emergency escape mask in all cases ;

- a combination of danger label number 2.2 and 6.1 is also possible for aerosols ;
- footnote 1) of the table with equipment for personal and general protection gives the impression that the columns represent the danger label numbers for the primary hazard, but this is not clear at all.

Proposals : According to note 1, each applicable entry in the table with additional guidance shall be observed for dangerous goods with multiple risks and for mixed loads ; therefore, the additional guidance “Use emergency escape mask” in column (3) of row 2.1 is to be eliminated ;

Clarify the meaning of “Danger label number” in the heading of the table with equipment for personal and general protection, by adding to it either the footnote “The danger label number of the primary hazard for dangerous goods with multiple risks”, or the footnote “Each applicable column shall be observed for dangerous goods with multiple risks and for mixed loads”.

If the danger label number is that of the primary hazard, add “ X<sup>1)</sup> “ in column 2.2 of the table giving the equipment for personal and general protection ; if not, eliminate “ X<sup>1)</sup> “ in column 2.1

*(See however also proposal 6).*

6. The equipment for personal and general protection is given in a table, separately for each danger label number. This is obviously not necessary for the first six rows (the equipment is needed in every case), and the three last rows are in contradiction with the actions in the event of an accident or emergency (as stated earlier) and can be removed. Moreover it is questionable whether the eye rinsing liquid is of no use when transporting (corrosive) gases, and Belgium would prefer to maintain its presence in all cases (as it was the case up till now). In view of all this, the remaining content of this table can be given much more efficiently in another form.

Proposal : indicate the required equipment as a list, consisting of the content of the first column of the table of equipment for personal and general protection ; for the emergency escape mask, the text would be “Only when a danger label or placard of number 2.3 or 6.1 is required [to represent the primary hazard] : an emergency escape mask for each member of the vehicle crew (for example with a combined gas/dust filter of the A1B1E1K1-P1 or A2B2E2K2-P2 type which is similar to that described in the EN 141 standard).

7. At the moment, the instructions in writing mention a telephone number where intervention services can obtain information concerning the dangerous goods when needed. This item will disappear inevitably when the unique document is introduced in 2009. Belgium is of the opinion that this source of information is too important to be lost, and that it should be retained under some other form (e.g. indicated on the transport document or transport unit).