



Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****113th session**

Geneva, 15-17 May 2023

Item 6 of the provisional agenda

Interpretation of ADR**Transport document - goods of each transport unit****Transmitted by the Government of Finland*****Introduction**

1. Finland considers it important that goods carried can be verified from transport documents during carriage. According to ADR 5.4.0.1 any carriage of goods governed by ADR shall be accompanied by the documentation prescribed in Chapter 5.4.
2. Generally it is understood that the documentation on a transport unit corresponds to the dangerous goods carried on that transport unit. However, this is not clearly required in ADR.
3. The first paragraph of 5.4.1.4.2 reads: "If by reason of the size of the load, a consignment cannot be loaded in its entirety on a single transport unit, at least as many separate documents, or copies of the single document, shall be made out as transport units loaded. Furthermore, in all cases, separate transport documents shall be made out for consignments or parts of consignments which may not be loaded together on the same vehicle by reason of the prohibitions set forth in 7.5.2."
4. It seems that if a load consisting of several packages needs to be divided for carriage on different transport units it is sufficient that a copy of the single document covering the whole load is on each transport unit without specifying which goods are on each transport unit. Separate transport documents are required for each vehicle only in the case of prohibition on mixed loading.
5. For rescue services, it is important to know which goods are carried on a specific transport unit in case of an accident.
6. Some of the exemptions are based on the quantities carried per transport unit (such as 1.1.3.6). And tunnel restriction codes would be assigned to the whole load of the transport unit. In these cases, it is important to know the goods carried on a transport unit and it is assumed that the transport document corresponds to the goods on the transport unit.

* A/77/6 (Sect. 20), table 20.6

7. In the future, electronic transport documents will become more common, and it should, in particular, be clear what information is required in the transport unit documents (documents corresponding to the goods on the unit). It has been suggested that, in the absence of a more specific provision, an electronic list of goods or a shipment list may be used more extensively as information in accordance with ADR Chapter 5.4 covering several transport units and that this should be considered a sufficient transport document provided that those lists (or copies) are available during transport.

8. Finland would like to hear the opinion of the Working Party whether further clarification or amendment of the provisions is needed.
