INF.12

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Section 8.1.5: Miscellaneous equipment

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

Transmitted by the Government of Sweden

Introduction

Sweden appreciates the work done by Germany, and supports their proposal in ECE/TRANS/WP.15/2007/25 concerning the instructions in writing. However, we would like to propose some amendments in the list of equipment.

We agree it would be advantageous for information about equipment to be stated directly after the Additional Guidance Table in the instructions in writing. Nevertheless, instead of presenting the information in a table, we would prefer repeating the list in 8.1.5 as proposed by Norway in INF.6.

Concerning the equipment and its details listed in 8.1.5.2, we are of the following opinion:

- Eye rinsing liquid: We do not see a need to require eye rinsing liquid when dangerous goods of Class 1 are carried. According to our experts on explosives, eye rinsing liquid would not be of any significant help in case of an incident or accident with goods in Class 1; the damage will likely be too severe.
 - Concerning footnote 1 in the proposal, we suggest replacing the text; "Not required for danger label numbers 2.1, 2.2 and 2.3" with "Not required for Classes 1 and 2".
- Gloves: Gloves made of nitrile rubber are useful when dealing with chemicals, but since the driver should not deal with leakage in such ways as to risk getting in contact with the chemical, we do not see the need to require such gloves. Therefore, we find it sufficient to require one pair of gloves partly made of leather, which could serve as protection in case of dealing with smaller fires in tyres, brakes or engine

compartments. Most drivers already use work gloves with leather palms for other purposes.

- <u>Collecting container</u>: For the same reason as stated by Norway in INF.6, we do not find it necessary to require a collecting container. Since there are no requirements on its size, it could be rather small. This would not be of any considerable help since small leaks are not likely to constitute a real threat to the environment.
- <u>Emergency escape mask</u>: According to the current regulations in ADR, S7 in Chapter 8.5 also applies to UN 1950 Aerosols in Division 2.2. Therefore danger label number 2.2 should be included in the text in 8.1.5.3.

Proposal

All amendments below are based on the text proposed in ECE/TRANS/WP.15/2007/25, changes in bold and underlined:

- 1) Substitute the table of equipment with the text proposed in 8.1.5.2.
- 2) Amend the text in 8.1.5.2 as follows:
 - 8.1.5.2 The following equipment shall be carried on board the transport unit for all danger label numbers:
 - for each vehicle, a wheel chock of a size suited to the weight of the vehicle and to the diameter of the wheel;
 - two self-standing warning signs;
 - eye rinsing liquid ¹⁾; and

for each member of the vehicle crew

- a warning vest (e.g. as described in the EN 471 standard);
- a pocket lamp;
- a pair of gloves made of nitrile rubber and a pair of gloves **partly** made of leather; and
- protective goggles.
- 8.1.5.3 Additional equipment required for certain classes:
 - an emergency escape mask ³⁾ for each member of the vehicle crew shall be carried on board the vehicle for danger label numbers 2.1 ⁴⁾, **2.2** ⁴⁾, 2.3 and 6.1;
 - $a \text{ shovel}^{2}$;
 - a drain seal ²⁾;
 - a collecting container made of plastics ⁵⁾.".

¹⁾ Not required for <u>Class 1 and 2</u> danger label numbers 2.1, 2.2 and 2.3.

²⁾ Only required for danger label numbers 3, 4.1, 4.3, 8 and 9.

4) Only required in combination with danger label number 6.1.
5) Only required for danger label numbers 3, 4.1, 8 and 9.

³⁾ For example an emergency escape mask 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.