

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 4 of the provisional agenda

Interpretation of ADR

Interpretation, if the packaging have to be approved or not

Transmitted by Government of Finland

1. In 1.1.3.1 (c) indicates that ADR does not apply to “the carriage undertaken by enterprises which is ancillary to their main activity, such as **deliveries** to or returns from building or civil engineering sites, or ..., in quantities of not more than 450 litres per packaging and within the maximum quantities specified in 1.1.3.6. ...
2. Carriage undertaken by such enterprises for their **supply** or external or internal distribution does not fall within the scope of this exemption.”
3. Does it mean, that these packaging have to be approved or can they be used without approval? After first paragraph it sounds, that they can be liberated from approval, but the last sentence excludes that.
4. It is typical, that enterprises apply these kind of packaging (5 x 200 l drums or 2 x 450 l IBC or similar). In the morning they go to the building site or to the road construction work with full packaging of fuel and in the evening they return with empty packaging. Does this activity cover the exemption in the first paragraph so that these transports are liberated from ADR provisions? Or does this activity mean the “supply” in sense of the second paragraph?
5. Finland would like to know the view of WP.15 on this matter.
