

# Economic Commission for Europe

## Inland Transport Committee

### Working Party on the Transport of Dangerous Goods

115th session

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Item 5 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:**

**Miscellaneous proposals**

## Layout of P200

### Note by the secretariat

## I. Introduction

1. When reviewing the amendments to packing instruction P200 stemming from the harmonization of *ADR* with the *Model Regulations*, we have identified some discrepancies. Consequently, we propose here a series of additional amendments to ensure alignment of the layout of P200 with the *Model Regulations* and consistency within *ADR*. All the amendments presented in this proposal are editorial in nature and do not intend to change *ADR* in a substantive manner.

## II. Use of bullets

2. Revision 23 of the *Model Regulations* converted most lists with bullets or dashes into lists with letters (lowercase Latin letters for first level lists and lowercase roman numerals for second level lists). This ensured a more consistent approach throughout the regulations and the advantage of easier references within the regulations and when amending them. These changes were transposed into *ADR* by the harmonization meeting. However, packing instruction P200 contains several lists which are not present in the *Model Regulations* and were missed in the transposition exercise. The proposal below applies the same logic to these lists.

### A. Proposal 1 (English)

4.1.4.1, P200 In (10) ab, renumber (i) to (iii) as (a) to (c).

In (10) ad, renumber (i) and (ii) as (a) and (b) and renumber the list with dashes as (i) and (ii).

In (13) 2.2, renumber the list with bullets as (a) to (e).

In (13) 2.3, renumber the list with bullets as (a) to (e) and renumber the list with dashes as (i) and (ii).

### B. Proposal 1 (French)

4.1.4.1, P200 Au point 10) ab, renommer i) à iii) en tant que a) à c).

Au point 10) ad, renommer i) et ii) en tant que a) et b) et renommer la liste en remplaçant les tirets par les lettres i) et ii).

Au point 13) 2.2, renommer la liste en remplaçant les tirets par les lettres a) à e).

Au point 13) 2.3, renuméroter la liste de premier niveau en remplaçant les tirets par les lettres a) à e) et la liste de deuxième niveau en remplaçant les tirets par les lettres i) et ii).

### **III. Explanation of terms in formulas**

3. Revision 23 of the *Model Regulations* contained some minor editorial amendments to the way terms in formulas were introduced, which we propose to adopt for *ADR* too.

#### **A. Proposal 2 (English)**

4.1.4.1, P200 In (5) (b), under the first and second formulas, after “where”, add a colon and start a new line after that.

In (5) (c), under the formula, after “where”, add a colon and start a new line after that.

In (10) z, under the first formula, replace “in which” by “where:” and start a new line after that. Under the second formula, after “where”, add a colon and start a new line after that.

#### **B. Proposal 2 (French)**

4.1.4.1, P200 Au point 5) b), au-dessous de la première et deuxième formules, après « où », ajouter un deux-points et démarrer une nouvelle ligne.

Au point 5) c), au-dessous de la formule, après « où », ajouter un deux-points et démarrer une nouvelle ligne.

Au point 10) z, au-dessous de la première et deuxième formules, après « où », ajouter un deux-points et démarrer une nouvelle ligne.

### **IV. Footnote numbering**

4. Revision 23 of the *Model Regulations* adopted the consistent criterion that for numbering purposes, footnotes are unique to each packing instruction. Therefore, if the same footnote appears in two different places in the same packing instruction, it should have the same letter, and if two different footnotes appear in the same packing instruction, they should have different letters, even if they appear in different pages or parts of the packing instruction. Furthermore, all footnotes should be placed directly below the packing instruction, on those pages on which they appear. This criterion was now adopted for *ADR* generally but has not been applied consistently in packing instruction P200. We propose to include a new amendment addressing this globally for P200.

#### **A. Proposal 3 (English)**

4.1.4.1, P200 Throughout the packing instruction, including tables 1 to 3, place the footnotes directly below the packing instruction, on those pages on which they appear and renumber them sequentially, as (a) to (i). This amendment supersedes all amendments regarding the placement and renumbering of footnotes in P200 in ECE/TRANS/WP.15/265.

#### **B. Proposal 3 (French)**

4.1.4.1, P200 Dans l'ensemble de l'instruction d'emballage, y compris les tableaux 1 à 3, placer les notes de bas de page directement sous l'instruction d'emballage, sur les pages où elles apparaissent et les renuméroter de manière séquentielle,

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comme a) à i). Cet amendement annule et remplace tous les amendements concernant l'emplacement et la renumérotation des notes de bas de page dans l'instruction d'emballage P200 dans le document ECE/TRANS/WP.15/265.

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