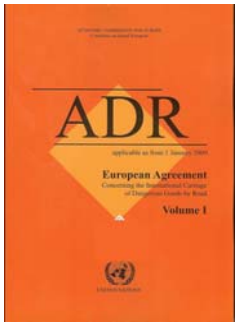
HAZFREIGHT HAZPAK 10

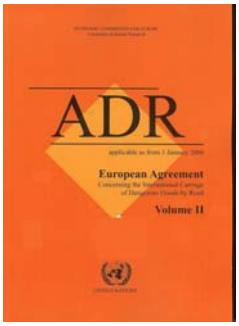
Dangerous ENews

Email update for National Dangerous Goods Training

December 2008 Edition

New Publications





ADR 2009 is now available. You can receive them at a discount price from the NDGTC website, you will need to login as the discounted price is only for NDGTC members.

Index

IMDG 2008 Amendment 34—08

ISBN: 978—92—801—4241—9

There is a one year introduction to this volume. Chapter 1.3 training of on shore staff becomes compulsory. So do not miss the NDGTC AGM where this will be discussed.

ICAO 2009 and 50th Edition IATA

ICAO ISBN: 978—92—9231—176—6
IATA ISBN: 978—92—9233—006—4

Driver CPC and ADR

As you are probably aware by the DSA have decided that part of the time spent on an ADR course can count towards the drivers certificate of professional competence (drivers CPC).

21 hours for attending the initial course and 7 hours for attendance on a refresher course.

More information will be announced at the NDGTC AGM Thursday 5th February 2009 at Roman Way Hotel, Cannock. See you there.

Court Case Involving Ammonium Nitrate Based Fertilizers

By Ray Prior, DGSA

On Friday, 11th July 2008 a Sheriff Court in Scotland found a farmer not guilty of 4 charges – i.e.:- no orange plates; inadequate personal protective and vehicle equipment; no fire extinguishers; and no information in writing. This had been ongoing since the alleged offences to place on 11th April 2007.

The farmer had 4 x 600 kg bags of ammonium nitrate based fertilizer secured on the back of his LGV lorry. When he arrived at his farm he had to go off the road in order to pass a police car which was parked at the entrance to his private road about 6 ft away from a cottage. The police had set up a speed trap by hiding behind this cottage. The farmer stopped his lorry and asked the police to move as they were compromising safety by reducing visibility for traffic leaving his farm onto a busy dual carriageway.

The police officer, accompanied by a woman police officer, took umbrage at this and got out of their vehicle to inspect his lorry. They saw four bags marked as containing UN2067 ammonium nitrate based fertilizers. The farmer said first of all that he was exempt as he had only been driving about 4 miles between agricultural lands owned by him. However, he went on to say that he was carrying fertilizer with a composition of 8.12.18.23 (this contained 8% nitrogen – it only becomes dangerous goods of packing group III when the nitrogen content reaches 27%) which had been decanted from a grain drill into recycled fertilizer bags to be spread by a fertilizer spreader. This was because the fertilizer was from a faulty batch which the grain drill couldn't handle.

The court case was originally set for 31 October 2007, with an intermediate diet (to decide if the charges should stand, be changed, or dropped) set for 10 October. This was postponed to 27 February 2007 with an intermediate diet on 9 February.

As a DGSA, I was approached by the farmer to assist him as an expert witness before the intermediate diet took place. I agreed, but pointed out that the exemption he claimed for moving fertilizer between agricultural grounds had ceased in May 2004 when new UK regulations came into force. I produced a statement to the effect that, as the farmer was not carrying dangerous goods and there was no objection under the regulations to the reuse of packagings for non dangerous goods, there was no case to answer. At the intermediate diet (which I did not attend) the police officer and the procurator fiscal insisted that the case should go ahead. The police officer reckoned he had a colleague who worked for Kemira (the firm that manufactured the fertilizer) who had stated that if a bag was marked as dangerous then it had to be treated as such and came under the regulations; and also the reuse of Kemira bags was not allowed as the bags had "single use only" written on them. We were given the impression that this person from Kemira would be attending the court. He never appeared on any of the dates.

The case was postponed again when the solicitor representing the farmer was too ill to attend on 27 February. The farmer had to attend for a new date to be set and took with him a fertilizer bag to show the Procurator Fiscal how it was reused. There was talk about the charges being changed to the farmer wrongly reusing the bags. I produced a second statement saying that Kemira put "single use only" on their bags to protect themselves from prosecution if the bags were reused for dangerous goods and did not meet the original standards. A new date

was set for 25 April 2008 when the Sheriff decided the original offences should be tried. We were kept waiting all day, with the case commencing at about 4:15 p.m. The Sheriff said that he would hear the case through to its conclusion. The police officer went into court carrying the 2005 ADR books with him. However, he couldn't find what he wanted in ADR and the Sheriff, getting fed up with him, suddenly called for an adjournment after about an hour, with a new date fixed for 11 July.

At this hearing on 11 July (which took a further 4 hours) the police officer changed his story saying that when he was in the cab checking the tachograph, he had a good view into the bags and could see that they had not been opened. The case then hinged on who was to be believed – the police or the farmer.

The farmer explained again how the bags were reused – the bag was raised up on a forklift truck and a 4 to 6 inch slit was made in the bottom through both the outer bag and the liner. When the bag was empty the liner was taken out and put back in upside down so that un-opened top was now at the bottom. The bag was then refilled through the 4 to 6 inch slit and the slit was then closed. As the bags held 600 kgs they could not be lifted manually to see if there was a slit in the bottom. There was evidence of a refund from Kemira for the faulty non -dangerous fertilizer and the farmer's sister gave evidence that she had decanted this fertilizer firstly into a concrete pit and then, with the use of an auger, into the bags. I was called to con-firm that this fertilizer was not dangerous goods and that there were no regulations preventing the reuse of the bags for non-dangerous goods.

The Sheriff, in his deliberation, said that the evidence given by the farmer and his sister was credible and the police evidence was not – he therefore found the farmer not guilty of all charges.

I consider that this case should never have come to court in the first place and was a waste of public money as well as a waste of time and money for the farmer.

2009 ADR

Well, it's that time again when the biennial series of revisions and updating of the regulations concerning the transport of dangerous goods occurs. The 2009 ADR is to hand, joy of joys! I'd like to take you through a tour of the changes. One major change will no doubt have hit you head on already – the changes to the requirements for instructions in writing (IiW). Important and fundamental though those changes are – I do not intend to neglect them – there are other changes deserving of your attention. It could be said, for example, that the changes to the classification and marking of aquatic pollutants in its own way is as least as important if not more so. And then there's that new acronym to get used to – an MEMU, not to be confused with the list of offerings at your local canteen! I'll try and explain why there are some 40 additional pages in the 2009 ADR. I shall deal with one or two subjects in their entirety and others through a sequential review of each part and chapter of the ADR.

Classification of Aquatic Pollutants

There are major changes to the rules for the classification of aquatic pollutants. This is a consequence of the need to align the transport regulations as far as necessary with the Globally Harmonised System (GHS). The changes should have happened at least two years ago but it was decided that they should be wrought across all the modes at the same time. The stumbling block to earlier implementation was the MARPOL convention which binds those writing the IMDG Code to the GESAMP profiles method of classification of marine pollutants. The convention had to be amended to allow the use of the GHS system for classification of aquatic pollutants in place of GESAMP profiles.

You can see the consequences in the ADR for this from 2.2.9.1.10 onwards. Previously the rules for the classification of pollutants occupied about half a page + a bit of Chapter 1.3 but now we have the best part of nine pages! I don't propose to go into all the detail of how it is done but it will force consignors to look again at all their substances and preparations to determine whether these classify as pollutants under the new rules. I would like to draw your attention to one part for which industry can thank the powerful interventions of the Department for Transport and colleagues from other ministries for their inclusion. I refer to the "bridging principles" which you will find at 2.2.1.10.4. These rules allow analogies to be made with similar substances which have been fully tested to be made for their classification.

You will see that the new air and sea mode regulations have also made the change over from e.g. the concept of marine pollutants to the more general concept of aquatic pollutants so that at least there is now international harmony. However the RID/ADR/ADN authorities could not bring themselves to let go of all past history. They decided that for classification for these modes one could still default back to the old situation based on the European Dangerous Substances and Dangerous Preparations Directives – see 2.2.9.10.5.2. Personally I see this as a retrograde step. I would have preferred a full clean break.

The RID/ADR/ADN have traditionally never required a classification exercise to be performed on goods which qualify as dangerous for any other reason, the understanding being that any spilt dangerous goods should be regarded as a danger to the aquatic environment. Not so with the IMDG Code which has always demanded a separate assessment as a marine pollutant to be made. The RID/ADR/ADN authorities, faced with having to implement the GHS criteria, had to debate whether this should continue. They decided against so that even for the European modes, if a substance or preparation meets the criteria for e.g. both Class 3

and as an aquatic pollutant, the additional marking for the aquatic pollution danger must be added.

Incidentally, it is explained in 2.2.9.1.10.2.2, second sentence that exotoxicity data from freshwater and marine species are considered to be equivalent for classification purposes

I'll round this part off by drawing your attention to new transitional provision 1.6.1.17 which allows aquatic pollutants not in conformity to be transported under the old rules until 31st December 2010.

Consequences for Marking of Containment Systems, Freight Containers etc.

The GHS proposes a different "mark" for aquatic pollutants compared to the familiar crossed fish mark of the IMDG Code:

The use of this mark is introduced into ADR for packages, IBCs, Large Packages etc as well as a larger version for freight containers, bulk and tanks. In keeping with previous practice in the ADR, its use is not required on packaged goods vehicles.

MEMUS

A raft of amendments to the ADR has been introduced to cover "MEMUS" – **M**obile **E**xplosive **M**anufacturing **U**nits. These devices, for which provisions are long overdue, are defined in 1.2.1 as "a unit, or vehicle mounted with a unit, for the manufacturing and charging explosives from dangerous goods that are not explosives. The unit consists of various tanks and bulk containers and process equipment as well as pumps and related equipment. The MEMU may have special compartments for packaged explosives".

A new chapter 4.7 has been added to cover their use whilst new chapter 6.12 deals with their construction and use. Further provisions had to be added to cover the vehicles which carry MEMUs at chapter 9.8. The vehicles are also to be made subject to an annual inspection of conformity by changes made to chapter 9.1.

Provisions concerning the placarding of MEMUs are inserted into 5.3.1.4 and for empty MEMUs at 5.3.1.6. A new provision is also added at the end of 5.3.2.1.2 which explains when Hazard Identification Numbers and UN numbers should be shown on the orange-coloured plates. Documentation requirements for empty MEMUs are dealt with in 5.4.1.1.6.2.2.

New limitations as to the quantity of explosives which can be carried on MEMUs have been added at 7.5.5.2.3.

Changes to chapter 8.2 mean that drivers of such vehicles are newly required to undergo "specialisation" training courses. If the MEMU has a tank, they will have to attend a tank specialisation course and if packages of Class 1, a Class 1 specialisation course. However,

you will doubtless have seen the revised paper the DfT intends to put forward to the ADR committee (WP.15) questioning what is the most appropriate training requirement. Maybe there will have to be a MEMU specialisation?

MEMUs, unless empty, are to be subjected to the Chapter 8.4 supervision rules through the addition of 8.4.2.

MEMUs are added to the list of vehicles which have to undergo an annual technical inspection similar to tank vehicles, explosive vehicles etc – see 9.1.2.3. New 9.2.1.2 dictates that they must meet the construction requirements for EX/III vehicles and a complete new Chapter 9.8 provides the remaining specific construction requirements for them.

The necessary transitional period to give duty holders a chance to implement these changes is given in 1.6.5.11.

Part 1.

General Exemptions – Chapter 1.1

The exemption at 1.1.3.1 (a) has been amended to insert "When these goods are flammable liquids carried in refillable receptacles filled by, or for, a private individual, the total quantity shall not exceed 60 litres per receptacle and 240 litres per transport unit". I do wonder how many members of the general public will pick up their ADR to check these quantities before embarking on their transport!

A new section 1.1.3.7 have been added to provide exemptions for lithium batteries installed in vehicles or equipment used during carriage.

Safety Obligations of the Participants – Chapter 1.4

A "note" has been added under (d) of the carrier's obligations concerning the movement of out-of-test tanks etc. This brings consistency with other parts of the ADR which provide for circumstances in which out-of-test tanks etc may be transported.

Transitional Arrangements – Chapter 1.6

There are some significant new provisions concerning transitional arrangements (grandfather rights). However I will deal with these as we come to them in the chapters to which they relate.

High Consequence Dangerous Goods – Chapter 1.10

As widely flagged up in discussions leading to the new ADR, the table of High Consequence Dangerous Goods in Chapter 10 has been extended to include explosive detonators and shaped charges of Class 1.4 covered by UN 0104, 0237, 0267, 0289, 0361, 0365, 0366, 0440, 0441, 0455, 0456 and 0500. Also added are all Class 1.5 explosives in packages and tanks (yes, if you've not picked up on it before, UN 0331, 0332 are allowed to be transported in UN portable tanks). There is a consequential amendment to the first indent in 1.1.3.6.2 to ensure that even if transported under the small load exemptions, these particular UN numbers are *not* exempted from the full Chapter 1.10 provisions.

Part 2

Classification of Wastes – Chapter 2.1

The results of a working group during the last biennium on problems concerning the classification of wastes can be seen at 2.1.3.5.5. The new text attempts to simplify the classification procedure and provides a link to the EU Directives on waste.

Part 3

The Dangerous Goods List.– Chapter 3.2

New UN numbers UN 0505, 0506, 0507 and 0508 are added to the explosives section and UN 3474 to 3481 are added at the end of the list.

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Special Provisions – Chapter 3.3

New UN special provisions SP 332 – 340 and ADR only SP 654 are added.

Limited Quantities – Marking of Vehicles

Controversial and hard to negotiate new provisions have been introduced at 3.4.9 to 3.4.13. They require vehicles over 12 tonnes maximum permitted gross mass carrying limited quantities packages to be marked "LTD QTY" in black letters not less than 65 mm high unless:

less than 8 tonnes of limited quantities are being carried

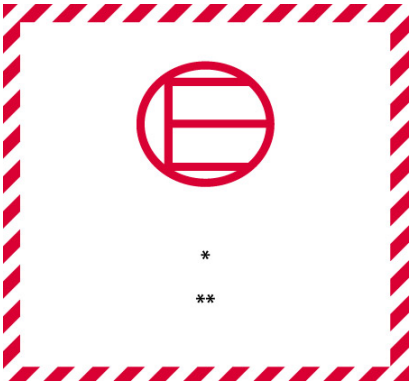
the vehicle needs to display orange plates

Notice that a new duty is imposed on consignors to inform carriers of the total gross mass of limited quantities packages they are offering for transport.

There is an exemption in the case of vehicles and freight containers marked as limited quantities according to the provisions of the IMDG Code but, in reality, this does not add up to much save that there are no vehicle/freight container quantity exemptions for sea transport marking compared e.g. to the still continued exemption from white van man to display any limited quantities markings on such vehicles.
NOTE: There is a new transitional provision in Chapter 1.6 at 1.6.1.18 delaying full implementation of these changes to vehicle/freight container marking to 01.01.2011.

Excepted Quantities – Chapter 3.5

Bringing the ADR into line with the Orange Book and the other modal regulations, new Chapter 3.5 is introduced for excepted quantities. A one-stop mark for these small packages is introduced:



There is a consequential change throughout the dangerous goods list because of the introduction of this chapter – a new column (7b) where the relevant “E” for excepted quantities provision can be seen.

Part 4

Use of Packagings – Chapter 4.1

New Packing Instructions P004, P010 are added.

Use of UN Portable Tanks

Special Tank Provisions TP12 and TP13 have been deleted. TP12 gave an indication as to whether a substance is highly corrosive to steel. I am particularly glad this has gone as it was applied rather arbitrarily. Correctly, in my opinion, it should be up to the consignor and tank operator to work out the compatibility of substances with the materials of construction of tank shells, pipework, valves, gaskets etc.

TP35 is added because there are some changes to the T-codes for a few products, some of which are quite radical shown in The Dangerous Goods List. (If anyone wants the exact list of these changes, please contact me.) It provides a transitional period up to the end of 2014 to make any changes.

Part 5

Orange-coloured Marking Plates – Chapter 5.3

There are a couple of easily missed changes in 5.3.2.2.1 and 5.3.2.2.2. In the first paragraph of 5.3.2.2.1 the following is inserted “It [the plates] shall remain affixed irrespective of the orientation of the vehicle”. This new rule is also applied to tank and bulk vehicles where interchangeable figures and letters are used to form the Hazard Identification Number and UN number. These changes may have an impact on slide-in orange-coloured plates and e.g. the rotating digits used to form “02”, “03”, “23” of UN 1202, 1202, 1223? A transitional period at 1.6.1.13 allows full compliance with these new requirements to be delayed until the end of December 2009.

Documentation – Chapter 5.4

The important change to note to this chapter (apart from IiW) is that it becomes mandatory to show the tunnel code on the transport document in the manner:

"UN 1098 ALLYL ALCOHOL, 6.1 (3), I, (C/D)

However, do note what it says in new 5.4.1.1.1 (k). The tunnel code need not be shown on the transport document if it is known beforehand that the load will not pass through a tunnel at any stage.

Part 6

Construction etc of (Gas) Pressure Receptacles – Chapter 6.2 (Also Chapter 1.8)

The current GB regulations run to some 80 or so pages. One of the reasons why they are so long is that they are used to implement the 1999 EU Transportable Pressure Equipment Directive. A working group has carried out much detailed and painstaking work during the past biennium to bring the provisions of this Directive into the RID/ADR/ADN. This has required its conformity assessment procedures to be introduced into a new 1.8.6 and 1.8.7 sections of Chapter 1.8. It has also meant an extensive revision, extension and restructuring of Chapter 6.2 so that it now deals with:

- UN certified pressure receptacles (which should be allowed in worldwide circulation)
- Non-UN certified pressure receptacles
- Non-UN certified pressure receptacles constructed to EN standards

As well as the traditional rules for aerosols and small gas cartridges (UN 2037).

The 2009 GB regulations can be shortened accordingly.

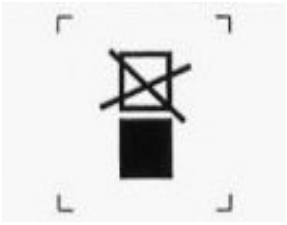
In order to provide some relief from all this from non-EU contracting States, some transitional periods to achieve compliance are provided in Chapter 1.6.

Because the TPED also applies to ADR gas tanks and tanks for UN 1052, UN 1790 >85%, one of the transitionals for them is to be found in new Special ADR Type Approval Provision TA4 and Special ADR Test Provision TT9.

Construction etc of IBCs – Chapter 6.5

A requirement has been introduced in Chapter 6.5 concerning the marking of IBCs. They must now be marked with a sign indicating their maximum stacking mass or, if non-stackable, a sign to this effect- see 6.5.2.2.2.

IBCs capable of being stacked



IBCs NOT capable of being

The symbol must be not less than 100 mm x 100 mm, be durable and clearly visible. The letters and numbers indicating the mass must be at least 12 mm high.

A transitional provision at 1.6.1.15 gives everyone concerned until 01.01.2011 to apply the new mark.

Construction etc of ADR Tanks – Chapter 6.8

For the tank anoraks (I plead guilty), there is one pretty momentous change I would like to point to. A lengthy process of producing EN standards to expand upon and refine the interpretation of Chapter 6.8 continues and will continue for some years to come. Some more standards are now incorporated and updates to cross-reference revisions of standards already established in the ADR are made. Two standards, for me, stand out in all this work. These are standards EN 13094 and EN 14025. The provide the basic design codes for non-pressure (G) tanks and for pressure tanks. Heretofore, competent authorities had the power to nominate any suitable design code they saw fit including the use of these two standards. However, by a change which you can see in column (4) of the table in 6.8.2.2.6 the use of these standards for the construction of new ADR tanks becomes mandatory from 01.01 2009 for pressure vessel tanks and 01.01.2010 for non-pressure tanks. This means that use e.g. of the old PD 5500 British design code which the DfT currently authorise for use will have to be withdrawn. All other ADR contracting States will have to do the same.

(If you complain that you cannot see the mandatory date I've quoted for the application of EN 13094 in the table, hold on. All will be revealed shortly.)

Construction etc of Waste Tanks – Chapter 6.10

Not something you can read in the book but the RID/ADR/ADN Joint Meeting has confirmed during this biennium a long-standing interpretation that Chapter 6.10 waste tanks can only carry dangerous goods waste and not new product.

Someone discovered that the traditional method of constructing the rotating suction boom of many waste tanks was contrary to what ADR required. Adjustments to the requirements for these booms have been made.

Part 8

Duties of Vehicle Crews – Chapter 8.3

An interesting little requirement has been added at 8.3.8 to require that the connection from a tractor unit and trailer used to operate ABS must be connected at all times.

Special Operating Provisions – Chapter 8.5

An anomaly was detected during the last biennium concerning the "S" provisions which trigger the vehicle supervision Chapter 8.4 were inconsistent with the list of High Consequence Dangerous Goods. Consequently changes have been made e.g. at S1 (6) to the quantities of explosives which trigger the need to comply with Chapter 8.4.

For similar reasons, the 100kg threshold in S14 has been removed, S20 is amended to add tanks >3000 litres, and new S22 – S24 are added.

Information in Writing Miscellaneous Safety Equipment

So, to bring this review of the 2009 ADR towards its close, let's consider the new one-stop-covers-all Instructions in Writing. The new provisions (I don't think we can call them "Tremcards" any more) have come about as the result of an impassioned crie-de-coeur from the international body which represents e.g. parcel carriers. They complained that on multi-collections, even from the same consignor, their drivers would be given sheaves of IiW for each UN number. Often the information would be repetitious. Often, when further consignments were collected from a later consignor, the further sets would be not that much different from the previous lot. FIATA asked whether it should be possible to reduce this burden on Brazilian rain forests by condensing and simplifying the whole process. UK DfT actively supported these efforts. The new provisions are the result of proposals put forward to WP.15 from a working group which took place during the last biennium.

We now have a four page single document to cover everything:

- A set of general actions to be taken by drivers
- Two pages of indications of danger and further courses of action to be taken linked to the label number
- A fourth page of safety equipment requirements linked to a revised 8.1.5

Apart from the significant change to the document itself I would draw your attention to the following:

- It becomes the *carrier's* duty to supply the new document
- They are only required in the vehicle crew language(s) and no longer in an official language of the countries of origin, transit and destination
- Eye wash is added to the list of safety equipment
- Protective gloves and eye protection is added as a mandatory requirement for each crew member (but not a hard hat, notice)
- Shovels, drain seals and "a collecting container made of plastic" become mandatory items of safety equipment to be carried on vehicles when Class 3, 4.1, 4.3, 8 and 9 goods are carried
- The requirement for an emergency escape mask is extended to all Class 6.1 substances, whether solid or liquid and no matter what packing group

There is no doubt that these changes will come as a mighty shock to carriers. They only have the normal six months transitional period to switch over to the new system. May I encourage you (I expect you are doing so already) to do what you can to make the new system known particularly to carriers.

Now for a few personal observations on the new provisions. I remain concerned that what has been put in for the Class 2 labels is inadequate to deal with the carriage of deeply refrigerated liquefied gases. As far as I am concerned there is no PPE which can afford protection of any great duration against coming into contact with liquids at temperatures of e.g. –200^{o}C or lower. I would not want to encourage any driver who has not received sufficient additional training in the use of the PPE provided by his employer to use it to carry out any of his legally- or employer-prescribed duties.

Since when was there a danger of fire and explosion from asbestos of Class 9. On the other hand surely the hazard characteristics of PCBs go understated?

The extension of the escape mask to all Class 6.1 substances gives me worries, too. I had less concerns when it was just applied to Class 2.3 toxic gases as (a) the number of toxic gases is small, (b) they are pretty well researched and the pathology established, (c) the chances of a significant new toxic gas being invented is probably very low and (d) above all a suitable respirator cartridge for each have long been on the market. I worry about toxic liquids and solids, though. The number of these already transported is large. There is a high probability that more, less researched from the point of view of PPE are likely to be produced. What is an employer to do in such circumstances. S/he has to find the right respirator cartridge which, the possibility has to faced, may not exist. I tried hard to convey this to the DfT but I do not see it reflected in the new provisions. I have now formally asked the question of the HSE whose immediate response was that I am probably right but that this was the first time the question had been posed to them. **For the moment I would say that it now behoves each employer of drivers likely to carry Class 6.1 solids and liquids to do a risk assessment with respect to what is a suitable emergency escape mask and, if necessary, to resort to an escape BA set if there is any doubt!**

A number of other questions concerning the new IiW are emerging such as “I only carry Class 3 petroleum products. Can I cut the length of pages two and three just to Class 3?” So far the answer is “No”. “Can I put my company logo on them?”. I would say “No”, too. Just follow the book as it is written. It’s easy enough, particularly when I give you the hint at the end of this section of my review. It is likely that at the same time as the new GB regulations are made to implement the 2009 ADR in domestic transport, some guidance will be put on the DfT website to answer these and other FAQs as they emerge.

Incidentally, I know of some consignors who have decided to stock copies of the new IiW to hand out to drivers whose employers have not yet cottoned on to the new requirements in order not to delay the dispatch of their goods.

Incidentally, too, the new IiW should be printed in colour. Monochrome copies may result in enforcement action.

There is a legal difficulty with allowing the use of the new IiW straight away in domestic traffic. Because of the new RID/ADR/ADN Framework Directive issued last September, we

have to wait until 01.07.09 to use them. However, HSE are minded to issue enforcement guidance to the effect that by joint agreement between the consignor and carrier, they may be used with no enforcement provided that all other requirements concerning the carriage of dangerous goods by road have been met.

I'll round this off by letting you into a little secret – though some of you may already be aware. All ADR contracting States have been encouraged to transmit their translations of the new IiW to the WP.15 secretariat in Geneva who will post them on their website for free download. The more this happens the better. Keep a watchful eye on the website:

http://www.unece.org/trans/danger/publi/adr/adr_linguistic_e.htm

At the time of preparing this review there were 14 languages available on this website including one in Belgian "Dutch" and Dutch "Dutch".

Late Changes and Corrections

Rather unusually, the WP.15 felt obliged to make a couple of changes to the 2009 ADR *after* it had gone to print. A rarely used express system of amending the treaty had to be activated to bring them in on time. The changes are reproduced below, one of which concerns the aforementioned EN 13094 whilst the first mentioned concerns MEMUs.

"Chapter 1.6

1.6.5.11 At the beginning, replace "before 1 January 2009" with "before 1 July 2009".

Chapter 6.8

6.8.2.6 In the Table, under "*For tanks with a maximum working pressure not exceeding 50 kPa and intended for the carriage of substances for which a tank code with the letter "G" is given in column (12) of Table A of Chapter 3.2*" and under "*For tanks intended for the carriage of liquid petroleum products and other dangerous substances of Class 3 which have a vapour pressure not exceeding 110 kPa at 50 °C and petrol, and which have no toxic or corrosive subsidiary hazard*", replace the entry for "EN 13094:2004" with the two following entries:

(1)	(2)	(3)	(4)	(5)
6.8.2.1	EN 13094:2004	Tanks for the transport of dangerous goods - Metallic tanks with a working pressure not exceeding 0.5 bar - Design and construction		Between 1 January 2005 and 31 December 2009
6.8.2.1	EN 13094:2008	Tanks for the transport of dangerous goods - Metallic tanks with a working pressure not exceeding 0.5 bar - Design and construction	As from 1 January 2010	Before 1 January 2010

6.8.3.4.6 (a) Delete ", UN No. 1067 dinitrogen tetroxide (nitrogen dioxide)".

Also errors in the 2009 text are already being discovered, one of which affects the IiW text! I repeat below those which affect the English edition below.

"1. 4.1.4.1, packing instruction P200, paragraph 11), table, fifth row

For

(7) and (10) ta (b)	**EN 1439:2008 (except 3.5 and Annex C)**	**LPG equipment and accessories -Transportable refillable welded and brazed steel Liquefied Petroleum Gas (LPG) cylinders - Procedures for checking before, during and after filling**

Read

(7) and (10) ta (b)	**EN 1439:2008 (except 3.5 and**	**LPG equipment and accessories – Procedures for checking LPG cylinders before, during and after filling**

2. 4.7.2.5

For 9.8.9 read 9.8.8

3. 5.4.3.4 Model of instructions in writing, fourth page, first sentence after the heading

For an board read on board"

My source for these late changes and corrections is the report of the WP.15 meeting of October 2008 at Annexes I and III.

I hope you have found my review of the 2009 of interest and apologies if I missed out a favourite change!

Any comments please forward them to me
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Do you have anything to put in the newsletter.