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Position Paper:

“Industry view on the need to enhance Global Harmonisation between the different modal transport regulations for dangerous goods”

AEGPL (European Liquefied Petroleum Gas Association)

AISE (International Association of Soap, Detergent and Maintenance Products)

CEFIC (European Chemical Industry Council)

CEPE (European Council of Paint, Printing Ink and Artists Colours Industry)

CLECAT (European Organisation for Forwarding and Logistics) &
FIATA (International Federation of Freight Forwarders Associations)

ECTA (European Chemical Transport Association)

EFMA (European Fertilizer Manufacturers Association)

Empac (ex-SEFEL) (European Metal Packaging)

EuPC (European Plastics Converters)

FEA (European Aerosol Federation)

FECC (European Association of Chemical Distributors)

GEA (Global Express Association)

IRU (International Road Transport Union)

ITCO (International Tank Container Organisation)

Objective and justification

The international carriage of dangerous goods is regulated for the different modes of transport (sea, air, road, rail and inland waterway) by international transport regulations. These are all based upon the UN Model Regulations, which are developed by the UN Committee of Experts on the Transport of Dangerous Goods. The total number of pages of all these regulations amounts to approximately 5,000 and this could be greatly reduced.

The UN Model Regulations are dealing with matters such as:

- Product classification criteria and corresponding test methods
- Provisions for the use of packagings, containers and tanks with corresponding requirements for construction and testing
- Labelling and marking provisions
- Documentation requirements

All these provisions are developed by the above mentioned UN Committee and are thereafter transposed into the different modal regulations.

The manufacturing, packaging, transporting, forwarding and distributing industries, which have to comply with these regulations, are of the opinion that the current transposition process can introduce differences between the UN Model Recommendation and the modal regulations which were not intended. This creates practical obstacles to multimodal transport operations, hampers trade facilitation and leads to unnecessary costs.

Even safety may be at risk in the chain of multimodal transport operations due to differences amongst the modal regulations applicable for the same dangerous goods. The shipment may well comply with regulations at the first stage of the journey but may result in incorrectly declared, packed and labelled or marked goods according to regulations applicable during a further stage in the transport chain.

Having harmonised regulations would offer several benefits:

- the absence of conflicting modal requirements would facilitate the preparation of intermodal transport journeys
- training in dangerous goods regulations would become simpler leading to a better understanding and more effective application of the regulations
- enforcement would become less subject to interpretation and would help enforcement agencies implementing a more uniform inspection system
- the introduction of national dangerous goods rules in emerging countries will be greatly facilitated, ensuring the application of identical regulations at a global level

Call for action

The industry invites political representatives to seriously consider and support the Industry's need for a political statement encouraging their national Competent Authorities, dealing with dangerous goods transport regulations, to further accelerate the harmonisation process and actively seek compromises with the objectives to achieve a uniform set of regulations.

A first major initiative that should be envisaged is the concentration of text, which is (nearly) identical in all modal regulations, into one document e.g. the classification of dangerous goods (current part 2), most packing and tank provisions (current parts 4 and 6), documentation requirements, etc. This would remove the need to re-discuss these issues in the modal regulation meetings, saving valuable time for both regulators and industry. Rather than repeating (nearly identical) texts, modal regulations could simply make use of a reference to the common text, complemented with mode-specific additional requirements (which would be few anyway) such as stowage requirements in the IMDG Code, tunnel restrictions in ADR.