

UK Guidance note for the application of marking provisions for transport units carrying dangerous goods by road packed in Limited Quantities in accordance with ADR

NOTE: This guidance note is the interpretation of the requirements contained within ADR 2009 and 2011 Editions by the UK regulators for the carriage of dangerous goods by road which may not be the interpretation of other signatory states to the ADR agreement

1. Introduction

1.1 ADR 2009 introduced a marking requirement for transport units carrying dangerous goods in limited quantities where the gross mass of the packages containing dangerous goods exceeds 8 tonnes per transport unit and the “maximum mass” of the transport unit exceeds 12 tonnes.

1.2 ADR 2011 makes some design changes to the marking to be used but the other requirements are unchanged except for the provision of information.

1.3 The term “maximum mass” of a transport unit is not defined in ADR or in other legislation (Road Traffic Acts etc).

1.4 This document provides guidance on the current and new requirements. It will be of use to carriers, consignors/shippers, operators, regulators etc.

2. ADR 2011 Provisions

2.1 The text below is reproduced from ADR 2011:

3.4.12 In advance of carriage, consignors of dangerous goods packed in limited quantities shall inform the carrier in a traceable form of the total gross mass of such goods to be consigned.

3.4.13 (a) Transport units with a maximum mass exceeding 12 tonnes carrying packages with dangerous goods in limited quantities shall be marked in accordance with 3.4.15 at the front and at the rear except when orange-coloured plate marking is [already]* displayed in accordance with 5.3.2.

(b) Containers carrying packages with dangerous goods in limited quantities, on transport units with a maximum mass exceeding 12 tonnes, shall be marked in accordance with 3.4.15 on all four sides except when placards are already affixed in accordance with 5.3.1.

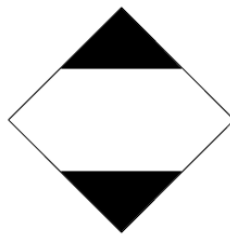
The carrying transport unit need not be marked, except when the marking affixed to the containers is not visible from outside this carrying transport unit. In this latter case, the same marking shall be affixed at the front and at the rear of the transport unit.

- 3.4.14 Markings specified in 3.4.13 may be dispensed with, if the total gross mass of the packages containing dangerous goods packed in limited quantities carried does not exceed 8 tonnes per transport unit.
- 3.4.15 The marking shall be that required in 3.4.7, except that the minimum dimensions shall be 250 mm × 250 mm.

* the word “already” was agreed to be included as a corrigendum to the 2011 ADR text in October 2010.

3. *The Limited Quantity Marking*

3.1 The marking to be used on transport units is illustrated below:



3.2 The minimum size shall be 250mm x 250mm

4. *Maximum Mass*

4.1 For the purposes of the carriage of limited quantities the UK Department for Transport interprets the phrase “maximum mass” to mean the unladen weight of the transport unit (vehicle). Therefore the transport unit must exceed 12 tonnes unladen weight before it needs to be marked in accordance with these provisions. Marking of the transport unit is then only a requirement if the total gross mass of the packages containing dangerous goods exceeds 8 tonnes per transport unit.

4.2 It is the duty of the carrier to determine the unladen weight of the transport unit. The carrier may however rely on information and data made available by other participants to determine this.

5. *Provision of Information*

5.1 Paragraph 3.4.12 of ADR 2011 requires the information about the total gross mass of the load to be in a traceable form. This does not imply a document must be generated as text messages or emails would be considered a traceable form.

6. ADR 2009

6.1 An alternative marking was required under ADR 2009 (3.4.12). This too is a permitted way of marking a transport unit effective from 1 January 2011. If used instead of the diamond marking it would consist of "LTD QTY" in black letters not less than 65mm high on a white background.

6.2 This marking, as depicted below, may be used until 30 June 2015 under ADR.



LTD QTY

6.3 Until 30 June 2015 it is also permissible to have a container marked with "LTD QTY" on a transport unit which is marked with the new limited quantity marking shown in paragraph 3.1 above.

7. Sea Journeys

7.1 The IMDG Code applies to all shipping operations, involving domestic or international sea journeys, from consignor to consignee, and the IMDG Code requires that all Cargo Transport Units carrying limited quantity loads (irrespective of mass) must be marked. The new edition of the IMDG Code (Amendment 35-10) uses the same new style (ADR 2011) marking. However the old marking of "LTD QTY" (ADR 2009/IMDG Code (Amendment 34-08)) or "LIMITED QUANTITIES" (IMDG Code (Amendment 34-08)) may not be used after 31 December 2011.