

**COMMITTEE OF EXPERTS ON THE TRANSPORT
OF DANGEROUS GOODS**

**Sub-Committee of Experts on the
Transport of Dangerous Goods**

**(Geneva, 5-16 July 1999,
agenda item 5(h))**

**MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Segregation of dangerous goods

Transmitted by the European Industrial Gases Association (EIGA)

The segregation proposals for gases contained in the United States submission do not match the provisions of ADR marginal 21 403 dealing with the prohibitions of mixed loading.

“Packages bearing a label conforming to models Nos. 2 (UN 2.2), 3 (UN 2.1 without class number) or 6.1 (UN 2.3 without class number) shall not be loaded together on the same vehicle with packages bearing a label conforming to models Nos. 1, 1.4 (except for compatibility group S), 1.5, 1.6 or 01.”

EIGA thus has difficulty in understanding the rationale behind a segregation requirement for flammable and toxic gases (Class 2.1 and 2.3). Half of the toxic gases are flammable anyway. Neither does the prohibition of mixed loading of toxic gases with classes 3, 4, 5 or 8 seem to make much sense. A number of products of Class 4.2, 4.3 and of Class 8 are packed in receptacles of Class 2 and are part of the same consignment.

The integrity and robustness of the gas packaging is such that a segregation requirement short of explosives is unjustified.
