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Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods

(Geneva, 1-10 September 2003)

UN Nos. 1372, 1387, 1856, 1857 and 3360

Transmitted by the Government of Germany*

The secretariat has received from the Central Office for International Carriage by Rail (OCTI) the proposal reproduced below.

Introduction

In the context of the harmonization with the twelfth revised edition of the United Nations Model Regulations, the introduction of some UN numbers into Table A of Chapter 3.2 of RID/ADR affected special provision 117 of the United Nations Model Regulations in Column (6). This special provision stipulates that these UN numbers are applicable to assignment as dangerous goods only when transported by sea. This is why Table A of Chapter 3.2 of RID/ADR only includes the reference "exempted/not subject to ADR" for these UN numbers.

* Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2003/44.

In Germany, for example, cloths or rags, depending on their properties, are assigned either to UN No. 3175 SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S, if the flash-point of the solvent used is less than 61° C, or to UN No. 1325 FLAMMABLE SOLID, ORGANIC, N.O.S., if the cloths or rags have properties of Class 4.1, or to UN No. 3088 SELF-HEATING SOLID, ORGANIC, N.O.S., if the cloths or rags have properties of Class 4.2.

Since a named entry now exists (UN No. 1856 RAGS, OILY), the German Government fears that cloths or rags soiled with oil will no longer be considered for their properties but will be carried as substances not subject to RID/ADR in accordance with the entry under that name.

The Government of Germany finds this disturbing from the technical safety point of view and considers that the incorporation of amendments in the Model Regulations has led to a mistake in RID/ADR.

Proposal

On the basis of the technical safety reservations it has expressed, the Government of Germany proposes that the following UN numbers should be deleted from Table A of Chapter 3.2, in the form of an erratum/corrigendum:

UN No. 1372 Fibres, animal or fibres, vegetable burnt, wet or damp, Class 4.2

UN No. 1387 Wool waste, wet, Class 4.2

UN No. 1856 Rags, oily, Class 4.2

UN No. 1857 Textile waste, wet, Class 4.2

UN No. 3360 Fibres, vegetable, dry, Class 4.1.

Since in the circumstances this is an important technical safety amendment and since these UN numbers were not previously part of Table A of Chapter 3.2, the Government of Germany further requests that this amendment should immediately be included in a new erratum/corrigendum to the 2003 edition.

Justification

Safety: The substances assigned to these UN numbers were previously assigned to an appropriate UN number on the basis of the properties demonstrated. They are now considered dangerous only for transport by sea. The safety level has thus decreased alarmingly. If these UN numbers are deleted from Table A of Chapter 3.2, the original safety level will be restored.

Feasibility: No problem exists since these UN numbers did not previously appear in Table A of Chapter 3.2.
