

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

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)

**UNITED
NATIONS**



**Economic and Social
Council**

**Distr.
GENERAL**

**TRANS/WP.15/AC.1/INF.3
28 July 2003**

Original: ENGLISH

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PART 3 OF RID/ADR/ADN

Chapter 3.3 – Special Provision 640

**Transmitted by the European Council of Paint, Printing Ink
and Artists Colours Industry (CEPE)**

Comments on TRANS/WP.15/AC.1/2003/32 from International Union of Railways

CEPE has consistently expressed concern about the implications of Special Provision 640 for consignors of packaged goods ever since it was introduced in 2001. CEPE strongly supports TRANS/WP.15/AC.1/2003/32 from UIC as, if adopted, it will overcome the difficulties being experienced.

Special Provision 640 was introduced into the Restructured RID/ADR 2001 in an attempt to replace some of the information lost with the replacement of Item Numbers – in particular to be sure that, for example, the structural strength of and settings of pressure relief devices on tanks and tankers were appropriate for the specific product concerned by confirming technical information in documentation. However, this was in disharmony with the requirements of the UN Recommendations and the IMDG Code.

When first introduced, SP640 created a major problem for consignors as it required a considerable amount of extra text in the description over and above the Proper Shipping Name, often beyond the capacity of conventional computer systems producing documents. This difficulty was recognised in the decision of the Joint Meeting to replace this requirement with a simpler “640X” code format. However, even in this simpler form, there were still difficulties for consignors of packages where considerations of structural strength and pressure relief do not apply. To overcome this problem, the French government presented paper TRANS/WP.15/AC.1/2001/44 in June 2001. This paper proposed limiting the application of SP640 and was adopted by the Joint Meeting in September 2001. However, during consideration of the text, an extra clause was added, stating that the exclusions proposed

applied “Provided that the above mentioned characteristics do not entail different hazard identification numbers in column (20)”.

This additional clause is creating difficulties. Paints, inks, adhesives, perfumery products, rubber, coating and resin solutions, wood preservatives, flavouring extracts, tars etc are classified into packing groups according to flashpoint as for all flammable liquids. However, viscous products with a flashpoint of less than 23°C can be moved from Packing Group II to III according to the table in 2.2.3.1.4.

The HIN is 33 for all the above mentioned materials in PGs I and II, and those moved from PG II to III as above. On the other hand, non-viscous materials with a flashpoint between 23°C and 61°C have a HIN of 30.

If a consignment consists totally of packages of material with flashpoints of less than 23°C (including viscous ones moved into PG III), all of HIN 33, it would not require the SP640X code to be applied to the documentation. Similarly if all the material were non-viscous PG III, and therefore HIN 30, no code would be required. However, if a mixed load were to be involved, then each entry would require an SP640X code, if the text were to be strictly interpreted. This is clearly an anomaly and we do not believe was the intention of the drafters of the amended text in September 2001 and makes no difference to safety.

Additionally for certain UN numbers (1267, 1268, 1308, 1863, 1987, 1989, 2059, 3295, 3336), although SP640 applies to packing groups I and II (i.e. those with HIN 33), it does not apply to packing group III materials (HIN30). Therefore for these materials in packages or portable tanks, the Special Provision 640X entry does not have to be made on documents, even if mixed packing groups are involved in the load. A similar situation arises for UN1790 Hydrofluoric Acid where SP640 applies to both PG I entries (HIN886) but not to PG II (HIN86).

Documentation, in harmony with other modes, provides all the information necessary for the safe transport of the materials covered by SP640. UN approved packages and IBCs have to conform to the packing group in any case and there is a requirement on consignors to ensure matching with vapour pressure etc. Other modes do not require the additional information called for under SP640 and it has not prejudiced safety. The proposal from UIC to restrict the application of Special Provision 640 simply to certain types of tanks overcomes all this complexity of documentation without prejudicing safety, will bring harmony with almost all documentation for other modes and facilitate multi-modal transport.

CEPE supports this approach.
