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Working Party on the Transport of Dangerous Goods

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

Bern, 25-28 March 2008
Item 5 (b) of the provisional agenda

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN* **

Carriage of animal material

Transmitted by the Government of France

* In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (c)).

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EXECUTIVE SUMMARY

Miscellaneous proposals aimed at facilitating the carriage of animal material:

- Carriage in bulk under provision VV10/VW10
- Exemption from security plan
- Proposal for work on a suitable packing instruction

Introduction

1. When ADR 2009 was incorporated in law in France, problems arose in respect of the carriage of animal material. These mainly concern:
 - Conditions of carriage in bulk and limited availability of BK1 or BK2 vehicles for land transport
 - Relevance of security measures
 - Packing conditions
2. The three proposals that follow are an attempt at solving the problems encountered.

Proposal 1

3. In column (17) of Table A, add special provision VV10 (ADR)/VW10 (RID) for UN Nos. 2814, 2900 and 3373 whenever “animal material only” is indicated in column (2).

Justification

4. At the last session of the Joint Meeting, RID/ADR provisions were extended to animal material corresponding to infectious substances of Category B (UN No. 3373). Appropriate provisions were established for carriage in bulk by assigning instructions BK1 and BK2 to this UN number. These options are already available for animal material transported under UN Nos. 2814 and 2900.
5. The concept of BK1 and BK2 containers is relatively recent, however, and the availability of these containers, which require approval by the competent authorities, is not adequate to meet the needs of slaughterers. Moreover, it is not possible or desirable for the competent authorities to approve a large number of BK1 and BK2 containers under unreasonable deadlines. This was recognized when these containers were introduced, with the old VV/VW provisions being retained in Chapter 7.3.
6. We propose that, in order to address this problem, a VV/VW provision should be assigned to the three UN numbers concerned, so as to establish provisions for carriage in bulk that are in line with the other cases where this is provided for by RID/ADR. No VV/VW provision is assigned to infectious substances, since their carriage in bulk was not regulated at the time these

provisions were introduced. In all other cases in which carriage in bulk is authorized, the VV/VW provisions apply, in addition to the BK instructions. There is no reason to penalize the carriage of animal material in this regard. The VV10/VW10 provision seems to be the most appropriate and the closest to what was practised under 2.2.62.1.12.2 of RID/ADR 2007 and the European regulations governing animal material.

Safety implications

7. No problems are foreseen. The proposal is in keeping with current practice, which does not pose any problems.

Feasibility

8. No problems are foreseen.

Proposal 2

9. In the list of high-consequence dangerous goods contained in Table 1.10.5, in the third column, for Class 6.2 goods, amend the text in parentheses to read:

“(UN Nos. 2814 and 2900, except for animal material)”.

Justification

10. The carriage of infectious substances of Category A is subject to the obligation on the part of the enterprises concerned to establish a security plan. Yet, it seems very unlikely that the carriage of animal material in the context of dead animal disposal would be an expected target of a malicious act or could be used for terrorist purposes.

11. Furthermore, such carriage is undertaken by enterprises that are marginally concerned by the transport of dangerous goods (slaughterers).

Safety implications

12. No problems are foreseen.

Feasibility

13. No problems are foreseen.

Proposal 3

14. The strict packing instructions for infectious substances (P260 or P650) also apply to the carriage of animal material. These instructions seem disproportionate when compared with the considerably less rigorous requirements for carriage in bulk recently included in the regulations. Cases may arise where it is necessary to carry small amounts of this material. While carriage in bulk is not suitable in these cases, carriage under the packing instructions (especially P620) seems equally unsuitable.

15. It is recalled that, with the deletion of instruction P099, as from 2009, the possibility of adaptation of packing conditions by the competent authorities will be precluded.
16. No text for adoption is proposed at this stage; nevertheless, the expert from France would like to request the opinion of the Joint Meeting on the following points:
1. Is it desirable to establish a simplified instruction for animal material of Category A or B?
 2. Should this work be carried out at the level of the UN Recommendations or should this simplification be envisaged for land transport only?
