

**Economic and Social Council**Distr.: General  
29 December 2010

Original: English

**Economic Commission for Europe****Inland Transport Committee****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, 21-25 March 2011

Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN: pending issues****Assignment of Packing Group I to various UN entries****Transmitted by the Government of the United Kingdom<sup>1,2</sup>***Summary*

<b>Executive summary:</b>	There are differences between the UN Model Regulations and RID/ADR/ADN relating to the assigned packing groups for various UN entries (UN numbers 1169, 1197, 1266, 1286 and 1287). The United Kingdom proposes to harmonize the systems.
<b>Action to be taken:</b>	Remove the assignment to Packing Group I for five UN entries.
<b>Related documents:</b>	Document ECE/TRANS/WP.15/AC.1/2010/11, informal document INF.30 from March 2010 Joint Meeting ECE/TRANS/WP.15/AC.1/118, paragraph 35.

<sup>1</sup> In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para.106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

<sup>2</sup> Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2011/14.

## Introduction

1. At the March 2010 session of the Joint Meeting during the discussion on document ECE/TRANS/WP.15/AC.1/2010/11 and informal document INF.30, the United Kingdom highlighted the difference between RID/ADR/ADN and the UN Model Regulations regarding the assignment of various UN entries to Packing Group I. RID/ADR/ADN allows for the assignment of Packing Group I to UN numbers 1169, 1197, 1266, 1286 and 1287 whereas the UN Model Regulations does not.

2. The United Kingdom believes that there should not be modal differences for the transport of these UN numbers. The International Maritime Dangerous Goods Code and the International Civil Aviation Organization Technical Instructions do not have Packing Group I entries for any of these five UN numbers which can mean practical problems for a multimodal journey.

## Background

3. The United Kingdom sought views from the Joint Meeting as to whether there was a need to retain Packing Group I assignment for these entries in RID/ADR/ADN. Some States believed that the assignment should be retained in RID/ADR/ADN as there were good reasons for applying Packing Group I in certain circumstances but the specific details of these reasons were not provided. Others argued that Packing Group I should not be assigned as it is not needed for these UN numbers and agreed with the United Kingdom for the need for modal harmonisation.

4. The report of the discussion as detailed in paragraph 35 of ECE/TRANS/WP.15/AC.1/118 concluded that the chemical industry representatives were invited to check whether the assignment of Packing Group I was justified for these UN numbers and that the United Kingdom would submit alignment proposals based on the research provided by the chemical industry.

5. The European Chemical Industry Council (CEFIC) has advised the United Kingdom that this issue was raised with their members and that there was no request to maintain Packing Group I entries of UN No. 1169 and UN No. 1197 and as such CEFIC would support their deletion from RID/ADR/ADN. The United Kingdom has not received any other information from industry regarding the allocation of Packing Group I to UN numbers 1266, 1286 and 1287.

6. Without confirmation of the need for the retention of Packing Group I to UN numbers 1266, 1286 and 1287 and in recognition that the UN Model Regulations does not have this assignment, the United Kingdom also proposes the deletion of the allocation of Packing Group I to these UN numbers.

7. However if evidence is provided which proves the need for the retention of Packing Group I for any of these entries then the United Kingdom would be prepared to raise this issue at the UN Sub-Committee of Experts for the Transport of Dangerous Goods in due course so that harmonization can be achieved.

## **Proposal**

3. In Chapter 3.2 Table A, delete the entries for Packing Group I for UN Nos. 1169, 1197, 1266, 1286 and 1287.

## **Justification**

4. These amendments would provide for harmonisation of RID/ADR/ADN with the UN Model Regulations for the transport of these substances.

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