

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

12 November 2013

Forty-fourth session

Geneva, 25 November – 4 December 2013

Item 8 of the provisional agenda

Global harmonization of transport of dangerous goods regulations with the Model Regulations

Outcome of the Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods on its Autumn 2013 session

Note by the secretariat

1. During the Autumn 2013 session of the Joint Meeting, some issues were raised in relation to the harmonization of RID/ADR/ADN with the 18th revised edition of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations and the secretariat was invited to bring them to the attention of the Sub-Committee.
2. Relevant paragraphs of the report (ECE/TRANS/WP.15/AC.1/132/Add.2) are reproduced as Annex I to this informal document. Texts concerning the transport of UN 3509 are reproduced in Annex II and texts provisionally adopted by the Joint Meeting for the transport in flexible bulk containers are reproduced in Annex III.

Annex I

Extracts from the report of the RID/ADR/ADN Joint Meeting (ECE/TRANS/WP.15/AC.1/132/Add.2)

A. Report of the ad hoc working group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods

20. The Joint Meeting took note of the report of the working group (ECE/TRANS/WP.15/AC.1/2013/31, Add.1 and Add.1/Corr.1) and considered the proposed amendments aimed at ensuring harmonization with the Model Regulations annexed to the eighteenth revised edition of the United Nations Recommendations on the Transport of Dangerous Goods. It adopted them, with some editorial changes (see ECE/TRANS/WP.15/AC.1/132/Add.2), [...]. It was agreed that any deviation would have to be brought to the attention of the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods.

Assignment of flammable liquids in packing group II to packing group III according to their viscosity

23. The Joint Meeting agreed in principle with the alignment of (2.2.3.1.4 and 2.2.3.1.5 of ADR) with the texts of the Model Regulations (2.3.2.4 and 2.3.2.5 of UN), [...].

24. It was noted, however, that alignment with the Model Regulations would mean that assignment to packing group III of viscous flammable liquids normally assigned to packing group II would no longer be possible for quantities greater than 450 litres, i.e., for transport in IBCs or in tanks. Moreover, alignment with the Model Regulations would not ensure multimodal harmonization; the IMDG Code limits this exemption to viscous flammable liquids transported in receptacles of 30 litres or less and not 450 litres; the ICAO Technical Instructions limit it to 30 litres for passenger aircraft and 100 litres for cargo aircraft. **The Joint Meeting therefore wished the industry concerned (CEPE) to communicate appropriate information on current practices (transport of these products in IBCs and tanks) and any economic consequences of a 450-litre limit for land transport.** Pending transmission of this information, 2.2.3.1.4 (d) of ADR was placed between square brackets. If this subparagraph was to be deleted so as not to set a quantity limit on this exception, it would be necessary to amend the introductory sentence to state that subsection 32.3.1.7 (d) of the Manual of Tests and Criteria was not applicable.

Provisions applicable to excepted packages of radioactive material

25. The Joint Meeting noted that the Government of Spain had submitted a proposal to the United Nations Sub-Committee of Experts (ST/SG/AC.10/C.3/2013/38) requesting the application of 5.1.5.2.3 to the transport of excepted packages. As the proposal is in accordance with the requirements of IAEA Safety Standards (SSR-6), it would be necessary to make reference to 5.1.5.2.3 in paragraph 1.7.1.5.1 (a) if this proposal is accepted as an amendment to the UN Model Regulations.

Special provision 225

28. The Joint Meeting considered that it was necessary to explain that the term “provisions applied in the country of manufacture” meant provisions applicable in the

country of manufacture itself, or provisions applicable in the countries of export where the extinguishers were to be used. **The United Nations Sub-Committee of Experts should be notified of this divergence from the UN Model Regulations.**

The amendment to clarify this issue consisted in adding a NOTE after the first sentence to read as follows:

“NOTE: “Provisions applied in the country of manufacture” means the provisions applicable in the country of manufacture or those applicable in the country of use.”

Special provision 370

29. The Joint Meeting noted that in principle the reference to Test Series 2 related to the mixture in UN No. 0222 and not other substances that should be excluded from the mixture. The Joint Meeting considered, however, that the wording of the French text was confusing and it could be useful to check the interpretation with Class 1 experts.

The Sub-Committee may wish to clarify whether the test in accordance to Test Series 2 referred in the second indent of SP370 applies to the whole mixture of ammonium nitrate and combustible substances or to the “any added substance” which are to be excluded from the mixture.

Special provision 371

30. The Joint Meeting was of the opinion that the wording of the last sentence of subparagraph (g) should be improved and that the French version should include a reference to effects outside the package.

Last sentence of subparagraph (g) reads as follows:

“There shall be no hazardous effects outside the package such as disruption of the package, metal fragments or a receptacle which passes through the packaging.”

« On ne doit pas observer d’effet dangereux en dehors du colis tel que l’éclatement du colis, l’expulsion de fragments métalliques ou du récipient lui-même à travers l’emballage. »

Special provision 375

31. The Joint Meeting pointed out that, for packagings containing solids, the text of the Model Regulations might be read as setting a limit of 5 kg for the whole package, and not per single or inner packaging of combination packagings, which did not seem to reflect the intention of this provision. The United Nations Sub-Committee of Experts should be informed.

The text of special provision 375 in RID/ADR/ADN will be as follows:

“375 These substances when carried in single or combination packagings containing a net quantity per single or inner packaging of 5 l or less for liquids or having, per single or inner packaging, a net mass of 5 kg or less for solids, are not subject to any other provisions of ADR provided the packagings meet the general provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8.”

Paragraph 1.1.3.10 (a) (UN 1.1.1.9)

Informal document: INF.47 (France)

32. The Joint Meeting decided to add a note to the paragraph in question to indicate that it also covered lamps brought by individuals to a first collection point and subsequently

carried to another collection point, an intermediate processing facility or a recycling facility.

The note reads as follows:

“NOTE: This includes also lamps brought by individuals to a first collection point, and then carried to another collection point, intermediate processing or recycling facility.”

Paragraphs 3.4.7.1 and 3.4.8.1

34. The French version of the provision relating to the background colour that could be used for the marking of dangerous goods in limited quantities was amended to align it better with the English version. However, the English version itself gave rise to problems of interpretation. When the marking was affixed as a label, could a background colour other than white and other than the background colour of the outside surface of the package be used? The Joint Meeting noted that this had not been intended. Could the black mark with a white centre be used on a package whose outside colour was black? The delegations that spoke felt that the intent of the text was that the background contrasted with the mark.

35. A member of the secretariat pointed out that the same kind of question could be raised for orientation arrows, for environmental pollutant marks and for excepted quantities marks. Originally, the IMDG Code had made provision for a mark in a colour contrasting with that of the package or, if a sticker was used, a black and white mark (para. 8.3.1 of the introduction to the IMDG Code, Amdt 25-89). The representative of the United Kingdom said that she would raise the question with the United Nations Sub-Committee of Experts.

36. The Joint Meeting also noted that the United Nations Sub-Committee of Experts intended to consider the question of the coherent use of the terms “mark” and “marking” throughout the Model Regulations. It was therefore premature to amend the current texts.

Overpacks for excepted packages

37. The Joint Meeting noted that paragraph 3.5.4.3 had in fact not been amended and had been erroneously included in the list of proposed amendments. Some questions were raised regarding the interpretation of the paragraph, including:

(a) Could a dispensation be made from the marking requirement on the overpack if the “excepted quantity” mark was visible, but on only one package contained in the overpack?;

(b) Should several excepted package markings be placed on the overpack if it contained packages in excepted quantities with dangerous goods of different classes and if the markings on those packages were not all visible?

The Sub-Committee may want to consider those questions.

Packing instructions P908 and LP904

38. Some editorial changes were adopted; **they should be brought to the attention of the United Nations Sub-Committee of Experts.**

These changes are:

4.1.4.1, P908 In the introductory sentence, insert “damaged or defective lithium ion cells and batteries and damaged or defective lithium metal cells and batteries, including those contained in equipment, of” after “applies to”.

Amend the second sentence to read as follows: “The following packagings are authorized provided the general provisions of 4.1.1 and 4.1.3 are met:”.

In paragraph 1, amend the beginning of the first sentence to read as follows: "Each damaged or defective cell or battery or equipment containing such cells or batteries ...". Remainder of the sentence unchanged.

Last sentence before "Additional requirements": (The modification does not apply to the English text of the proposed amendment).

4.1.4.3, LP904 Amend the introductory sentence to read as follows: "This instruction applies to single damaged or defective batteries of UN Nos. 3090, 3091, 3480 and 3481, including those contained in equipment."

In paragraph 1, amend the beginning of the first sentence to read as follows: "Each damaged or defective battery or equipment containing such a battery...". Remainder of the sentence unchanged.

Fumigated cargo transport units

39. The representative of the Russian Federation considered that it was not logical to include on the label "DO NOT ENTER" just below the inscription "VENTILATED ON ...". He proposed that the two inscriptions should be inverted, as it should presumably be safe to enter a fumigated unit after it was ventilated.

40. The Joint Meeting shared this view but considered that in order to make such an amendment it would first be necessary to propose it to the United Nations Sub-Committee of Experts, as the label in question was taken from other long-standing instruments, such as the IMO Recommendations on the safe use of pesticides in ships and other ILO, FAO and WHO recommendations providing instructions to ensure safe fumigation. Reference should also be made to 5.5.2.3.1.

Amendments to Chapter 6.4

41. It was noted that some amendments to the English text had not been reflected in the French and Russian texts of the IAEA Regulations. The secretariat was requested to bring the cases in question to the attention of the IAEA translation services or the French- or Russian-speaking authorities competent for the transport of radioactive material, so as to verify whether there were any reasons for such divergences (for example, why amendments to 6.4.15.5 in English do not affect the French text; accuracy of the Russian translation of 6.4.23.10 (g)).

Unilateral approval

42. The Joint Meeting considered that the current paragraph 6.4.22.6, which dealt with unilateral approval issued by the Contracting Parties to RID or ADR or by third countries, and which was not mentioned in either the UN Model Regulations or the IAEA Regulations, should be kept in RID and ADR.

Russian version of ADR

43. The representative of the Russian Federation said that he would like to introduce several editorial amendments to the Russian version of ADR. He provided the secretariat with a list of such amendments for forwarding to the Russian translation section of the United Nations Office at Geneva. A member of the secretariat pointed out that it would be useful for the Russian Federation to officially propose to the United Nations Sub-Committee of Experts that such amendments to the Russian version should be introduced first to the Model Regulations, thus ensuring that the proposed amendments would also be acceptable to sea, air and road transport administrations, as well as to the administrations of other Russian-speaking countries, if possible. The Russian-speaking delegations could for

instance set up an informal drafting committee, possibly with the participation of the Russian translation service of the United Nations. That would also make it possible to ensure that other regulations, for example the ICAO Technical Instructions, would be amended accordingly.

Application of special provision 172 to UN Nos. 2977 and 2978 (uranium hexafluoride)

Informal document: INF.36 (Secretariat)

45. In the light of the comments from IAEA and the explanations by the secretariat, the Joint Meeting agreed that special provision 172 should no longer be applied to these two entries. **It shared the concern of the representative of Austria, however, at the fact that the toxicity hazard is not mentioned in Column (5) of Table A and therefore hoped that this matter would be discussed in the United Nations Sub-Committee of Experts.**

Gas cylinders used in fire extinguishers of UN No. 1044 and in stationary fire extinguishing systems

Document: ECE/TRANS/WP.15/AC.1/2013/40 (Germany)

Informal document: INF.25 (Germany)

46. The Joint Meeting adopted the proposal to add an explanatory note to special provision 225, with some changes (see ECE/TRANS/WP.15/AC.1/132/Add.2).

The Note reads as follows:

“NOTE: Pressure receptacles which contain gases for use in the above-mentioned fire extinguishers or for use in stationary fire-fighting installations shall meet the requirements of Chapter 6.2 and all requirements applicable to the relevant gas when these pressure receptacles are carried separately.”

Transitional provisions for the dimensions of markings required under 5.2.1.1

Informal document: INF.44 (Italy)

48. The representative of Italy said that, owing to the large number of cylinders concerned, it would be very difficult in his country to ensure compliance with the new dimension requirements for markings on LPG cylinders (UN Nos. 1011, 1075, 1965, 1969 and 1978) in accordance with 5.2.1.1, applicable from 1 January 2013, within the time frames established under 1.6.1.25. He therefore intended to propose a multilateral agreement to make it possible to delay compliance of the markings until the date of the next periodic inspection.

49. Several delegations said that they were confronted with the same problem and therefore expressed interest in such an agreement. It was also suggested to consult the industrial gases industry to find out whether the problem arose as well for gases other than LPG.

Damaged or defective lithium cells and batteries

Document: ECE/TRANS/WP.15/AC.1/2013/50 (Switzerland)

Informal documents: INF.34 (Switzerland)

INF.43 (RECHARGE)

INF.48 and 48/Rev.1 (Switzerland and RECHARGE)

50. Taking into consideration the introduction of special provisions 376 and 377 on the transport of damaged or defective lithium batteries, and following a lengthy discussion, the Joint Meeting adopted amendments to special provision 636 (b) [which is specific to

RID/ADR/ADN], so as to better address the actual situation of collection for disposal or recycling, on the basis of informal document INF.48/Rev.1 (see ECE/TRANS/WP.15/AC.1/132/Add.2). However, the idea of restricting the application of the amended provision only to collection from consumers was not accepted.

Paragraph (b) of special provision 636 was amended to read as follows:

“(b) Up to the intermediate processing facility, lithium cells and batteries with a gross mass of not more than 500 g each or lithium ion cells with a Watt-hour rating of not more than 20 Wh, lithium ion batteries with a Watt-hour rating of not more than 100 Wh, lithium metal cells with a lithium content of not more than 1 g and lithium metal batteries with an aggregate lithium content of not more than 2 g, whether or not contained in equipment, collected and handed over for carriage for disposal or recycling, together with or without other non-lithium cells or batteries, are not subject to the other provisions of RID/ADR/ADN including special provision 376 and paragraph 2.2.9.1.7, if they meet the following conditions:

- (i) The provisions of packing instruction P909 of 4.1.4.1 (ADN: of ADR) apply except for the additional requirements 1 and 2;
- (ii) A quality assurance system is in place to ensure that the total amount of lithium cells or batteries per wagon or large container/transport unit does not exceed 333 kg;

NOTE: The total quantity of lithium cells and batteries in the mix may be assessed by means of a statistical method included in the quality assurance system. A copy of the quality assurance records shall be made available to the competent authority upon request.

- (iii) Packages are marked “LITHIUM BATTERIES FOR DISPOSAL” or “LITHIUM BATTERIES FOR RECYCLING” as appropriate.”.

UN No. 3509, PACKAGING DISCARDED, EMPTY, UNCLEARED

51. The representatives of the United Kingdom and Sweden were not in favour of the principle of introducing UN No. 3509 in RID and ADR, as they considered that the current provisions were sufficient. They emphasized that IMO had not introduced UN No. 3509 in the IMDG Code.

52. The Chairman recalled that the UN number in question had been introduced into the Model Regulations to take into account the wishes of the Joint Meeting and to help the European chemical industry and waste recyclers to comply with the European requirements for the collection and recycling of waste. The Model Regulations left it for the competent authorities to regulate the conditions of transport. It was understandable that the introduction of the UN number in question would not be of interest to non-European countries that did not similarly regulate waste collection, including for sea transport.

53. Most delegations were in favour of introducing the provisions proposed by France following the work of the informal working group on the question. The provisions, in particular the parts in square brackets, were given due consideration.

54. The decision was taken, by vote, not to require labelling or placarding for the primary and subsidiary hazards posed by each residue.

55. A few other editorial changes were made and the amended texts were adopted by a large majority (see ECE/TRANS/WP.15/AC.1/132/Add.2).

All amendments related to UN 3509 are reproduced in annex II for information of the Sub-Committee.

Transitional measures on the marking for asymmetric capacitors (UN No. 3508), double-layer capacitors (UN No. 3499) and cylinders for adsorbed gases (P208, para. (1))

Informal document: INF.57 (Secretariat)

56. The Joint Meeting noted that the United Nations Sub-Committee of Experts had at its June 2013 session recommended that transitional measures should be adopted for the marking of the energy storing capacity of capacitors in Wh and for the application of paragraph 1 of packing instruction P208 for cylinders intended for the transport of adsorbed gases (see ST/SG/AC.10/C.3/86, paras. 51 and 61). The Joint Meeting therefore adopted the corresponding transitional provisions for inclusion in Chapter 1.6 (see ECE/TRANS/WP.15/AC.1/132/Add.2).

B. Topics of interest under “Interpretation of RID/ADR/ADN” (agenda item 5)

Use of the letter “W” in the packaging codes

Informal documents: INF.12 (France)
INF.24 (Belgium)

57. Several delegations considered that it was inappropriate to use the code “W” for new kinds of packagings for which there were no provisions or definitions in the regulations. It was understandable that the industry would develop new kinds of packagings to meet logistical needs, but they should then be submitted to the United Nations Committee of Experts so that they could be accepted for the transport of dangerous goods.

58. At the request of the Joint Meeting, it was agreed that the representative of France would submit such questions of interpretation in an informal document to the United Nations Sub-Committee of Experts at its next session, so as to prompt a discussion and settle the problem at the multimodal level.

Classification of mixtures containing dangerous substances other than environmentally hazardous substances and substances presenting hazards only for the environment

Informal documents: INF.18 (Germany)
INF.19 (Secretariat)

59. The Joint Meeting took note of the conclusions of the IMO editorial and technical group (E&T Group), according to which a mixture containing a dangerous substance (such as UN No. 1090, ACETONE, Class 3) and a substance that was hazardous only for the environment (UN No. 3077 or 3082, Class 9) should be classified under the UN number for the dangerous substance (UN No. 1090, ACETONE).

60. It was noted that such a classification would not comply with the one set out in RID/ADR/ADN, as 2.1.3.5 required that mixtures containing two dangerous substances, whatever their classes, should be classified in a collective entry.

61. It was also noted that the decision to delete the column relating to Class 9 in the precedence of hazards table in 2.1.3.9, taken at the previous session of the Joint Meeting, might in future lead to problems of interpretation, as there would no longer be a provision setting out that, unless otherwise specified, dangers of Classes 1 to 8 took precedence over those of Class 9.

62. The Joint Meeting considered that the attention of the United Nations Sub-Committee of Experts should be drawn to such cases of the classification of mixtures

containing substances of Class 9 and that it would be preferable not to amend the current RID/ADR/ADN before an agreement was reached on a multimodal solution.

The Sub-Committee may wish to consider developing provisions for the classification of mixtures containing substances of Class 9 and other dangerous substances.

C. Topics of interest under “Proposals for amendments to RID/ADR/ADN” (agenda item 6)

Gas cylinders in ships and aircraft

Document: ECE/TRANS/WP.15/AC.1/2013/53 (France and Sweden)

Informal document: INF.52 (France and Sweden)

70. The Joint Meeting adopted a new special provision 662, as proposed in option 2 of informal document INF.52, with some changes (see ECE/TRANS/WP.15/AC.1/132/Add.2). The provision would make it possible to transport gases of classification codes 1A, 1O, 1F, 2A, 2O, 2F and 4F (i.e. non-toxic, non-corrosive compressed, liquefied or dissolved gases) in gas cylinders that are not in conformity with RID/ADR Chapter 6.2, but that are authorized in accordance with other regulations and found on board ships and aircraft.

Full text of special provision 662 is reproduced below for information of the Sub-Committee (as later editorially amended by WP.15):

“662 Cylinders not conforming to the provisions of Chapter 6.2 which are used exclusively on board a ship or aircraft, may be carried for the purpose of filling or inspection and subsequent return, provided ~~that all the other relevant requirements of RID/ADR/ADN and other conditions are met including the cylinders are designed and constructed in accordance with a standard recognized by the competent authority of the country of approval and all the other relevant requirements of ADR are met including:~~

- ~~(a) The cylinders have been designed and constructed in accordance with a standard recognized by the competent authority of the country of approval;~~
- (ba) The cylinders are shall be carried with valve protection in conformity with 4.1.6.8 (ADN: of ADR);**
- (eb) The cylinders are shall be marked and labelled in conformity with 5.2.1 and 5.2.2; and**
- (d) All the relevant filling requirements of packing instruction P200 of 4.1.4.1 (ADN: of ADR) are shall be complied with; and,**
- (e) —The transport document shall include the following statement: “Carriage in accordance with special provision 662”.”.**

Draft information coding for electronic data interchange

Document: ECE/TRANS/WP.15/AC.1/2013/47 (UIC and IRU)

79. The Joint Meeting gave its agreement in principle to the approach proposed by UIC and IRU for the coding of information to be taken into account in the computer applications and electronic data interchange systems.

80. It was suggested that the work could be carried out in the informal working group on telematics. The Joint Meeting noted, however, that UIC and IRU were prepared to start work, and that a first document could be submitted at the next session of the Joint Meeting, before the informal working group on telematics would meet.

81. A member of the secretariat pointed out that IATA had undertaken similar steps a few years before and that an exchange of information would be useful.

Ventilation of wagons/vehicles carrying packages containing a coolant

Document: ECE/TRANS/WP.15/AC.1/2013/44 (France)

Informal documents: INF.39 (Austria)
INF.59 and INF.59/Rev.1 (editorial group)

88. The Joint Meeting recognized that it was not logical to require the body of a vehicle to be ventilated when a package containing a coolant was being transported in a cargo transport unit intended for controlled temperature transport, the insulated body of which was specifically designed not to be ventilated. It was therefore decided not to apply 5.5.3.3.3 when the unit was insulated, refrigerated or mechanically refrigerated, as defined in the Agreement on the International Carriage of Perishable Foodstuffs and on the Special Equipment to be Used for such Carriage (ATP) (see ECE/TRANS/WP.15/AC.1/132/Add.2).

Paragraph 5.5.3.3.3 was amended to read as follows:

“5.5.3.3.3 Packages containing a coolant or conditioner shall be carried in well ventilated vehicles and containers. This provision does not apply when such packages are carried in insulated, refrigerated or mechanically refrigerated equipment, as defined in the Agreement on the International Carriage of Perishable Foodstuffs and on the Special Equipment to be Used for such Carriage (ATP).”

89. The Joint Meeting also noted the information provided by Austria (INF.39) on the tragic death of a chef linked to the fact that he was carrying a package containing dry ice in his private vehicle. As there was no written proposal on the subject, the Joint Meeting did not discuss the issue further, but several delegations stressed the importance of having a separation between the driver’s cab and the load compartment. The question was also raised of whether the final sentence of paragraph 5.5.3.1.5, adopted at the previous session, was relevant because it stated “As a rule, it is assumed that packages containing dry ice (UN 1845) as a coolant do not present such a risk.” (ECE/TRANS/WP.15/AC.1/130, annex II).

In this respect the Sub-Committee may want to note that the Joint Meeting had adopted, at its previous session, an additional paragraph 5.5.3.1.5 which reads as follows:

“5.5.3.1.5 Sub-sections 5.5.3.6 and 5.5.3.7 only apply when there is an actual risk of asphyxiation in the vehicle or container. It is for the participants concerned to assess this risk, taking into consideration the hazards presented by the substances being used for cooling or conditioning, the amount of substance to be carried, the duration of the journey and the types of containment to be used. As a rule, it is assumed that packages containing dry ice (UN 1845) as a coolant do not present such a risk.”

D. Reports of informal working groups (agenda item 7)

Informal working group on test periods for packing instruction P200

Document: ECE/TRANS/WP.15/AC.1/2013/42 (EIGA)

Informal documents: INF.35 (United Kingdom)
INF.53 (EIGA)

90. While the Joint Meeting as a whole welcomed the progress made by the informal working group, several delegations were still reluctant to extend the test period to 15 years from 10, at least in the conditions set out by the group in document ECE/TRANS/WP.15/AC.1/2013/42. It was therefore decided to bring the experts together to meet during lunch breaks and in the evening, which led to the production of an amended proposal (INF.53).

91. As there was still no consensus, the amended proposal was put to the vote and was adopted by a vote of 7 to 3. In response to a comment by the representative of the United Kingdom the chairman confirmed that this was in accordance with the rules of procedure (see ECE/TRANS/WP.15/AC.1/132/Add.2).

The Sub-Committee may wish to note that RID/ADR already contains provisions authorizing the extension of the interval for periodic inspection of refillable welded steel cylinders intended for the carriage of LPG (UN Nos. 1011, 1075, 1965, 1969 and 1978) from 10 to 15 years (Packing instruction P200 para (12)).

This will also be permitted in future for aluminium alloy cylinders and seamless steel cylinders and bundles of such cylinders intended for the carriage of non-toxic, non-corrosive compressed gases (UN Nos. 1002, 1006, 1046, 1049, 1056, 1065, 1066, 1072, 1954, 1956, 1957, 1964, 1971, 2034 and 3156) and some non-toxic non-corrosive gases (UN Nos. 1013, 1070 and 1080) under certain conditions (New paragraph (13) in P200 of RID/ADR) (see ECE/TRANS/WP.15/AC.1/132/Add.2).

Informal working group on flexible bulk containers

Documents: ECE/TRANS/WP.15/AC.1/2013/37 (United Kingdom)
ECE/TRANS/WP.15/AC.1/2013/59 (United Kingdom)

Informal documents: INF.4 (IDGCA)
INF.10 (United Kingdom)
INF.32 and Adds 1-2 (IDGCA)

92. The Joint Meeting noted with interest that, following the meeting of the informal working group, IDGCA had run static stability tests on vehicles loaded with flexible bulk containers. The results were presented in informal documents INF.32 and INF.32/Add.1 and in associated video projections (INF.32/Add.2).

93. It was noted, however, that the test conditions were not fully consistent with the requirements of ECE Regulation No. 111 for evaluating the lateral rollover stability of fixed tank vehicles. The test under Regulation No. 111 is carried out on a tilt table, with the vehicle loaded to its maximum authorized mass and a minimum 70% filling factor, and with a stabilized lateral acceleration of 4 m/s².

94. The Joint Meeting noted that the test conditions and success criteria provided for under that Regulation were not applicable in the case of vehicles loaded with flexible bulk containers; the test results would, however, make it possible to estimate the possible stability problems even if the success criteria were not applied. IDGCA was therefore invited to carry out such tests on vehicles loaded with flexible bulk containers as they are expected to be used, and to submit a test report at the next meeting of the Working Party on the Transport of Dangerous Goods (WP.15), as provided in paragraph 9 of the report of the informal working group (ECE/TRANS/WP.15/AC.1/2013/59).

95. As to the drafting proposals in document ECE/TRANS/WP.15/AC.1/2013/37 and informal document INF.10, the Joint Meeting decided to adopt them provisionally with some changes, namely:

- To include an additional paragraph 7.3.2.9.4 setting a mass limit (14 tonnes per container) and a height/diameter ratio placed between square brackets;
- To require approval of design type and test procedures by the competent authority as provided under 6.1.5.1.1 for packagings;
- To resolve some editorial issues regarding consequential amendments (see ECE/TRANS/WP.15/AC.1/132/Add.2).

97. It was also noted that the conclusions of the group on preventing the entry of water during transport should be brought to the attention of the United Nations Sub-Committee of Experts (ECE/TRANS/WP.15/AC.1/2013/59, para. 12).

These conclusions were as follows:

”It was confirmed that all FBCs were fully closed in compliance with the United Nations requirement and that any venting devices necessary for particular substances were no-return vents that would prevent the possible ingress of moisture. It was confirmed that of the substances currently assigned BK3, this issue was only pertinent to UN 3378. Nevertheless, it was agreed that the second sentence of paragraph 4.3.1.16.2 in the United Nations Model Regulations should be amended to read ‘The vent shall be so designed that the penetration of foreign substances **or the ingress of water** is prevented under normal conditions of transport.’”.

The texts provisionally adopted by the Joint Meeting for the transport in flexible bulk containers are reproduced in Annex III.

Informal working group on telematics

Informal documents: INF.3 (OTIF)
INF.15 (CTIF)

98. The Joint Meeting held a long discussion on the report of the informal working group (INF.3) after the representatives of France and Germany made presentations.

99. The representative of Sweden presented briefly a review performed on the proposed architecture. The report¹ mainly addresses the issues in terms of logistics and information sharing.

100. Several delegations expressed concern because the industry had already developed its own telematic systems to exchange computerized data. They were afraid that the industry would be forced to discard such systems so as to implement a single system.

101. The Chairman said that the plan was not to establish a special, single system, but to set up interfaces making it possible to obtain information managed by the existing ones. Full-scale tests should take place in the near future to help decide what status would be given to the planned interfaces.

¹ Available in English at the time of publishing this report at <https://www.msb.se/en/Prevention/Transport-of-dangerous-goods/Telematics/>

102. The representative of the Russian Federation said that an automated system had been set up in his country and had been in constant operation since 2008. The Chairman invited him to make a detailed presentation of the system at the next session.

103. In conclusion, the Joint Meeting:

(a) Validated the work done by the group and considered that the resulting architecture was suitable for further development;

(b) Invited the informal working group, and specifically those delegations with projects under way, to continue to work in accordance with the recommendations made by the group;

(c) Invited the Contracting Parties to ADR, RID and ADN to remain in contact with the European Union to determine on the one hand how the European Union could be involved in a possible future system and in its operation, and on the other hand what support the European Union could provide to standardization in the field in question.

Annex II

Texts adopted in relation to the transport of UN 3509

UN No. 3509, PACKAGING DISCARDED, EMPTY, UNCLEANED

The adopted amendments regarding UN 3509 are reproduced below:

Chapter 2.1

2.1.5 Add a new paragraph to read as follows:

“2.1.5 Classification of packagings, discarded, empty, uncleaned

Empty uncleaned packagings, large packagings or IBCs, or parts thereof, carried for disposal, recycling or recovery of their material, other than reconditioning, repair, routine maintenance, remanufacturing or reuse, may be assigned to UN 3509 if they meet the requirements for this entry.”.

Chapter 2.2

2.2.9.3, M11 Amend the proposed entry for UN No. 3509 to read as follows:

“3509 PACKAGINGS, DISCARDED, EMPTY, UNCLEANED”.

Chapter 3.2, Table A, new entries

Modify the proposed entry for UN No. 3509 to read as follows:

(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7a)	(7b)	(8)
3509	PACKAGINGS, DISCARDED, EMPTY, UNCLEANED	9	M11		9	663	0	E0	P003 IBC08 LP02

(9a)	(9b)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
RR9		BK2					4	VC2				90
BB3							(E)	AP10				
LL1												

Chapter 4.1

4.1.1.11 At the end, add a new Note to read as follows:

“**NOTE:** When such packagings are carried for disposal, recycling or recovery of their material, they may also be carried under UN 3509 provided the conditions of special provision 663 of Chapter 3.3 are met.”.

4.1.4.1, P003 Under “Special packing provision specific to RID and ADR:”, replace “provision” by “provisions” and add a new special packing provision RR9 to read as follows:

“RR9 For UN 3509, packagings are not required to meet the requirements of 4.1.1.3.

Packagings meeting the requirements of 6.1.4, made leak tight or fitted with a leak tight and puncture resistant sealed liner or bag, shall be used.

When the only residues contained are solids which are not liable to become liquid at temperatures likely to be encountered during carriage, flexible packagings may be used. When liquid residues are present, rigid packagings that provide a means of retention (e.g. absorbent material) shall be used.

Before being filled and handed over for carriage, every packaging shall be inspected to ensure that it is free from corrosion, contamination or other damages. Any packaging showing signs of reduced strength, shall no longer be used (minor dents and scratches are not considered as reducing the strength of the packaging).

Packagings intended for the carriage of packagings, discarded, empty, uncleaned with residues of Class 5.1 shall be so constructed or adapted that the goods cannot come into contact with wood or any other combustible material.”.

4.1.4.2, IBC08 At the end, add: “Special packing provision specific to RID and ADR:

BB3 For UN 3509, IBCs are not required to meet the requirements of 4.1.1.3.

IBC meeting the requirements of 6.5.5, made leak tight or fitted with a leak tight and puncture resistant sealed liner or bag, shall be used.

When the only residues are solids which are not liable to become liquid at temperatures likely to be encountered during carriage, flexible IBCs may be used.

When liquid residues are present, rigid IBCs that provide a means of retention (e.g. absorbent material) shall be used.

Before being filled and handed over for carriage, every IBC shall be inspected to ensure that it is free from corrosion, contamination or other damages. Any IBC showing signs of reduced strength, shall no longer be used (minor dents and scratches are not considered as reducing the strength of the IBC).

IBCs intended for the carriage of packagings, discarded, empty, uncleaned with residues of Class 5.1 shall be so constructed or adapted that the goods cannot come into contact with wood or any other combustible material.”.

4.1.4.3, LP02 At the end, add: “Special packing provision specific to RID and ADR:

LL1 For UN 3509, large packagings are not required to meet the requirements of 4.1.1.3.

Large packagings meeting the requirements of 6.6.4, made leak tight or fitted with a leak tight and puncture resistant sealed liner or bag, shall be used.

When the only residues are solids which are not liable to become liquid at temperatures likely to be encountered during carriage, flexible large packagings may be used.

When liquid residues are contained, rigid large packagings that provide a means of retention (e.g. absorbent material) shall be used.

Before being filled and handed over for carriage, every large packaging shall be inspected to ensure that it is free from corrosion, contamination or other damages. Any large packaging showing signs of reduced strength, shall no longer be used (minor dents and scratches are not considered as reducing the strength of the large packaging).

Large packagings intended for the carriage of packagings, discarded, empty, uncleaned with residues of Class 5.1 shall be so constructed or adapted that the goods cannot come into contact with wood or any other combustible material.”.

Chapter 5.4

5.4.1.1.19 Add a new paragraph to read as follows:

“5.4.1.1.19 *Special provisions for carriage of packagings, discarded, empty, uncleaned (UN 3509)*

For packagings, discarded, empty, uncleaned, the proper shipping name specified in 5.4.1.1.1 (b) shall be complemented with the words “(WITH RESIDUES OF [...])” followed by the class(es) and subsidiary risk(s) corresponding to the residues, in the class numbering order. Moreover, 5.4.1.1.1 (f) does not apply.

Example: Packagings, discarded, empty, uncleaned having contained goods of Class 4.1 packed together with packagings, discarded, empty, uncleaned having contained goods of Class 3 with a Class 6.1 subsidiary risk should be referred in the transport document as:

“UN 3509 PACKAGINGS, DISCARDED, EMPTY, UNCLEANED (WITH RESIDUES OF 3, 4.1, 6.1), 9”.”.

Chapter 7.3

7.3.2.9 Add the following new sub-section to read as follows:

“7.3.2.9 *Goods of Class 9*

7.3.2.9.1 For UN 3509, only closed bulk containers (code BK2) may be used. Bulk containers shall be made leak tight or fitted with a leak tight and puncture resistant sealed liner or bag, and shall have a means of retaining any free liquid that might escape during carriage, e.g. absorbent material. Packagings, discarded, empty, uncleaned with residues of Class 5.1 may be carried in bulk containers which have been so constructed or adapted that the goods cannot come into contact with wood or any other combustible material.”.

Annex III

Texts provisionally adopted by the Joint Meeting for the transport in flexible bulk containers (in addition to UN text)

The draft amendments concerning carriage in flexible bulk containers specific to RID, ADR and ADN are reproduced below:

6.11.5.3 (UN 6.8.5.3) *Inspection and testing*

6.11.5.3.1 (UN 6.8.5.3.1) The design type of each flexible bulk container shall be tested as provided for in 6.11.5 in accordance with procedures established by the competent authority allowing the allocation of the mark and shall be approved by this competent authority.

7.3.2.10.3, last sentence (UN 4.3.1.16.2) “The vent shall be so designed that the penetration of foreign substances or ingress of water is prevented under normal conditions of carriage.”.

“7.3.2.10.4 Flexible bulk containers shall be filled in such a way that when loaded the ratio of height to width does not exceed [(ADR: 1,1)] [(RID: 1,2)]. The maximum gross mass of the flexible bulk containers shall not exceed 14 tonnes.”.

Add a new sub-section 7.5.7.6 to read as follows:

7.5.7.6 *Loading of flexible bulk containers*

7.5.7.6.1 Flexible bulk containers shall be carried within a (ADR:) vehicle or container/(RID:) wagon or container with rigid sides and ends that extend at least two-thirds of the height of the flexible bulk container.

NOTE: *When loading flexible bulk containers in a (ADR:) vehicle or container/(RID:) wagon or container particular attention shall be paid to the guidance on the handling and stowage of dangerous goods referred to in 7.5.7.1 and to the IMO/ILO/UNECE Guidelines for Packing Cargo Transport Units (CTUs).*

7.5.7.6.2 Flexible bulk containers shall be secured by suitable means capable of restraining them in the (ADR:) vehicle or container/(RID:) wagon or container in a manner that will prevent any movement during carriage which would change the position of the flexible bulk container or cause it to be damaged. Movement of the flexible bulk containers may also be prevented by filling any voids by the use of dunnage or by blocking and bracing. Where restraints such as banding or straps are used, these shall not be over-tightened to cause damage or deformation to the flexible bulk containers.

7.5.7.6.3 Flexible bulk containers shall not be stacked."

ADN only:

4.1.3 In the first sentence, insert “, bulk containers” after “wagons”

In the first indent, delete “with the exception of BK3 containers”.

7.1.4.14.1.1 Add the following sentence at the end:

“Flexible bulk containers shall be stowed in such way that there are no void spaces between flexible bulk containers in the hold. If the flexible bulk containers do not completely fill the hold, adequate measures shall be taken to avoid shifting of cargo.”.

(Source: IMDG Code, para. 7.6.2.12.2)

7.1.4.14.1.2 Add the following sentence at the end:

“Flexible bulk containers may be stacked on each other in holds provided that the stacking height does not exceed 3 high. When flexible bulk containers are fitted with venting devices, the stowage of the flexible bulk containers shall not impede their function.”.

(Source: IMDG Code, para. 7.6.2.12.3 and 7.6.2.12.4)
