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## Economic Commission for Europe

### Inland Transport Committee

### Working Party on the Transport of Dangerous Goods

#### Hundredth session

Geneva, 9–13 May 2016

Item 6 b) of the provisional agenda

#### **Proposals for amendments to Annexes A and B of ADR: miscellaneous proposals**

## Carriage of coal in bulk

### Transmitted by EURACOAL<sup>1</sup>

### Introduction

1. Poland presented document ECE/TRANS/WP.15/AC.1/2014/47 on bulk carriage of coal at the September 2014 session of the Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods. In addition, 3 informal documents either commented or complemented this document: Informal documents INF.4 (Poland/Euracoal), INF.24 (ECFD) and INF.29 (Secretariat).
2. Due to lack of time, these documents could not be considered during the session.
3. The Chairman of the Joint Meeting suggested that the issue of bulk carriage of coal by road be solved through appropriate ADR multilateral agreements.
4. Poland followed the suggestion and initiated multilateral agreement M282 concerning the carriage of UN 1361 CARBON, packing group III and UN 3088 SELF-HEATING SOLID, ORGANIC, N.O.S. packing group III. Poland, Germany and France signed the agreement up to date.
4. The Working Party noted on its ninety-seventh session (3 to 6 November 2014), that the ADN Safety Committee and the RID Committee of Experts' standing working group had adopted provisions to exempt, under certain conditions, the carriage of hard coal, anthracite and coke through the use of a new special provision and that EURACOAL

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<sup>1</sup> In accordance with the draft programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/WP.15/2015/19 (9.2)).

would present a document at the next session to include equivalent provisions for road transport in ADR.

5. EURACOAL herewith proposes to include a new special provision in ADR in full accordance with multilateral agreement M282.

## Proposals for amendments to ADR

6. Part 3, Chapter 3.2, Table A should be amended as follows:

Chapter 3.2, Table A, UN No. 1361 Carbon animal or vegetable origin, packing group III, column (6) and UN No. 3088 SELF-HEATING SOLID, ORGANIC, N.O.S. packing group III, column (6),

insert a reference to a special provision „xxx“.

7. Part 3, Chapter 3.3, Special Provision: Add a new special provision to read as follows:

„xxx By derogation from the provisions of ADR, section 3.2.1, Table A, carriage of hard coal, coke and anthracite, meeting the classification criteria of Class 4.2, packing group III is not subject to ADR provisions.“

## Reasons

8. Unlike the transport of UN 1361 coal in inland waterway vessels or by train, there is no need for additional or equivalent provisions for road transport in ADR like in RID and ADN for the following reasons:

a) The volumes of coal carried in lorries is much smaller than in vessels or trains and therefore, the risk of self-heating much lower.

b) In contrast to the transportation of coal in vessels or trains, the lorry can immediately stop in case the coal should be self-heated and can empty the lorry to reduce the temperature of the coal.

c) The duration of road transport is much shorter than in vessels or in trains because for economic reason the transportation route is very short. Therefore, the danger of self-heating of coal can be practically excluded.

d) Transportation of coal on roads rarely takes place (emergency case).

e) If the coal should be transported by lorries, the lorry is loaded not by conveyor belt but by caterpillars and they do not have any possibility to measure the temperature before or after loading. A measuring of temperature seems also to be disproportional to the risk of a self-ignition of the coal.

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