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Working Party on the Transport of Dangerous Goods

Bern, 25-28 March 2008

Item 6 of the provisional agenda

REPORTS OF INFORMAL WORKING GROUPS ^{*/ **/}

Working group on the assignment of special provision (SP) 274

Transmitted by the European Chemical Industry Council (CEFIC)

Background

1. At the March 2007 session of the Joint Meeting, CEFIC presented document ECE/TRANS/WP.15/AC.1/2007/15 which pointed out the differences in the assignment of SP 274 (which requires the Proper Shipping Name to be supplemented with the technical name) between the modal regulations. RID/ADR/ADN indeed assigns SP 274 to more UN entries than the UN Model Regulations, the International Maritime Dangerous Goods (IMDG) Code and the ICAO Technical Instructions. At the meeting, opinions were divided and CEFIC agreed to coordinate the work of a correspondence group that would verify, on a case-by-case basis,

^{*/} 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)).

^{**/} Circulated by the Intergovernmental Organization for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2008/3.

whether there were grounds for retaining or removing SP 274 in RID/ADR/ADN for entries to which it was not assigned in the UN Model Regulations. Input was received from Austria, Belgium, Germany, Italy, Portugal, Switzerland and United Kingdom.

2. The result of this work was presented as ECE/TRANS/WP.15/AC.1/2007/43 and INF.3 (the detailed list of substances with received comments) at the September 2007 session of the Joint Meeting, and although there were some informal discussions, it was not possible to progress further.

3. CEFIC therefore organized an informal Working Group that met on 24 October 2007 and which was attended by representatives from Austria, Belgium, France, Germany, Netherlands, the United Kingdom and CEFIC.

4. As the UN Sub-Committee of Experts on the Transport of Dangerous Goods (UNSCETDG) is the most adequate forum to achieve harmonisation, this report was already submitted as INF.25 at its thirty-second session December 2007 with the request to provide comments.

5. The Sub-Committee noted with satisfaction the work undertaken and agreed to address the issue at its next meeting in July 2008, taking into account the results from the discussion at the Joint RID/ADR/ADN meeting in March 2008.

Structure of the discussion

6. In order to have an effective discussion, the comments, which requested keeping SP 274 in RID/ADR/ADN, were grouped as follows:

- (a) Comments related to the link with special provisions dealing with classification and for which the removal of SP 274, could lead to substances being classified wrongly or being carried despite being prohibited;
- (b) Comments related to the need of information for stowage and segregation purposes in the IMDG Code;
- (c) Comments related to the need for the technical name, especially for toxic substances;
- (d) Specific comments on UN 1075 (Petroleum gases);
- (e) Comments related to medicines (UN Nos. 1851, 3248 and 3249);
- (f) Comments related to gas samples (UN Nos. 3167, 3168 and 3169);
- (g) Comments related to metal catalysts (UN Nos. 1378 and 2881);
- (h) Specific comment on inorganic peroxides (UN 1483);
- (i) Comments on elevated temperature substances (UN Nos. 3256, 3257 and 3258).

Discussion

(a) Link with special provisions dealing with classification

7. The majority view was to require SP 274 for those UN numbers for which a special provision indicated that the carriage of a certain substance, corresponding to the description of the UN number, is prohibited.

8. The special provisions envisaged are SP 103, 559, 604, 605, 606 and 608. They have been highlighted in green in Table 1 of informal document INF.3.

Justification:

9. This helps carriers (see ADR 1.4.2.2.1 (a) and enforcement officers to check if the goods were authorised for carriage. Additionally it provides an extra reminder to consignors.

10. It should be noted that the substances mentioned in these special provisions correspond to those also listed in SP 900 of the IMDG Code (as indicated in Table 1 of informal document INF.3), and in Table 2.1A of the International Air Transport Association's Dangerous Goods Regulations Manual (DGR), which both prohibit the transport of certain substances by respectively sea and air.

11. The other special provisions (all in the "500" range) do not relate to the prohibition of carriage but are a user-friendly reminder that substances should be classified in the appropriate class under the appropriate UN number.

(b) Need of information for stowage and segregation purposes

12. All participants agreed that SP 274 is not required for the purpose of stowage and segregation according to the IMDG Code.

Justification:

13. The IMDG Code (see 3.1.4.4) has grouped substances into "segregation groups" for assigning segregation provisions so that there is no longer a need for the technical name.

(c) Need for the technical name, especially for toxic substances

14. The majority view was to require SP 274 for all substances of class 6.1 (particularly for PG I substances, as even small amounts can present a major risk, but generally also for PG II and III substances, as this is in line with the current assignment of SP 274 to substances of class 6.1).

Justification:

15. Knowledge of the technical name of toxic substances may speed up the provision of appropriate first aid measures, as e.g. Poison Centres, may more rapidly identify adequate measures.

16. All participants agreed not to require SP 274 for substances of other classes for which the name was sufficiently clear so that the provision of the technical name would not lead to taking different emergency measures.

(d) Specific comment on UN 1075 (Petroleum gases)

17. All participants agreed that SP 274 should be kept.

Justification:

18. Without SP 274 it would be impossible to determine the maximum permissible filling ratio.

19. There was however no need to introduce this requirement in the UN Model Regulations as this is a specific RID/ADR/ADN issue.

20. Formal alignment with the UN Model Regulations could be achieved by incorporating the requirement of SP 274 into SP 583 ("This entry covers, inter alia, mixtures which as Mixture A, have a vapour pressure at 70 °C not exceeding 1.1 MPa (11 bar) and a density at 50 °C not lower than 0.525 kg/l etc.). However, this was not perceived as being a task for this working group.

(e) Comments related to medicines (UN Nos. 1851, 3248 and 3249)

21. All participants agreed that SP 247 is required.

Justification:

22. Knowledge of the technical name will help to identify proper first aid measures (similar as justification in comment (c)).

23. The working group questioned whether SP 220 ("Only the technical name of the flammable liquid component of this solution or mixture shall be shown in parentheses immediately following the proper shipping name"), assigned to UN 3248 (Medicine liquid, flammable, toxic, n.o.s.), needs to be maintained or needs to be amended.

(f) Comments related to gas samples (UN Nos. 3167, 3168 and 3169)

24. All participants agreed that there was no need to require SP 274.

Justification:

25. The last paragraph of 2.1.4.1 in RID/ADR/ADN explicitly does not require the technical name when an n.o.s. entry is used to carry the sample (which is actually the case for UN Nos. 3167, 3168 and 3169).

(g) Comments related to metal catalysts (UN Nos. 1378 and 2881)

26. All participants agreed that SP 247 is required.

Justification:

27. The technical name may provide information that could be important to identify the proper extinguishing medium (e.g. to know whether CO₂ could be used) or the other substances the catalyst could react with.

(h) Specific comment on inorganic peroxides (UN 1483)

28. All participants agreed that there was no need to require SP 274.

Justification:

29. Knowledge of the technical name will not lead to different emergency measures being taken.

(i) Comments on elevated temperature substances (UN Nos. 3256, 3257 and 3258)

30. There was a majority view to require SP 274.

Justification:

31. Knowledge of the technical name will help emergency services selecting the proper extinguishing medium (e.g. presence of alcohol in the substance carried) or will help estimating the temperature (e.g. melting point of the substance carried).

32. The need for requiring SP 274 for aquatic pollutants was briefly discussed but was not considered to be an issue for this working group as the RID/ADR/ADN Joint Meeting had recently decided that there was no need for an additional mention of “aquatic pollutant” on the transport document for substances, classified as aquatic pollutant.

33. For completeness marine pollutants according to paragraph 3.1.2.8.1.3 of the IMDG Code (amendment 33-06), have been indicated in the column “IMDG” in Table 2 of informal document INF.3.

Conclusion

34. In accordance with the decisions taken, the assignment of SP 274 was reviewed:

- (i) SP 274 is proposed to be retained in RID/ADR/ADN and proposed to be assigned also to these entries in the UN Model Regulations if either of the following comments applies:

- Comment (a), if also SP 103, SP 559, SP 604, SP 605, SP 606 or SP 608¹ applies;
 - Comment (c) (substances of class 6.1);
 - Comment (e) (medicines);
 - Comment (g) (metal catalysts); or
 - Comment (i) (elevated temperature substances);
- (ii) SP 274 is proposed to be removed from entries in RID/ADR/ADN if any of the following comments, but none of the comments listed above, applies:
- Comment (b) (segregation);
 - Comment (f) (gas samples); or
 - Comment (h) (inorganic peroxide);
- (iii) SP 274 is proposed to be retained for UN 1075 in RID/ADR/ADN but not proposed to be assigned to this entry in the UN Model Regulations.

Proposal

35. It is proposed to amend RID/ADR/ADN as follows:

For UN Nos. 1353, 1373, 1389, 1390, 1391 (both entries), 1392, 1393, 1421, 1477 (PG II and III), 1481 (PG II and III), 1483 (PG II and III), 1740 (PG II and III), 2430 (PG I, II and III), 2583, 2584, 2585, 2586, 2837 (PG II and III), 2985, 2986, 2987, 2988, 3089 (PG II and III), 3145 (PG I, II and III), 3167, 3168, 3169, 3211 (PG II and III), 3215, 3216, 3218 (PG II and III), 3401 and 3402, delete “274” in column (6).

Note: The corresponding entries are highlighted in orange in Table 2 of informal document INF.3.

36. It is further proposed to recommend to UNSCETDG:

- (i) To add SP 274 in column 6 of the Dangerous Goods List of the UN Model Regulations for the entries that are not highlighted in the list in Table 2 of informal document INF.3;
- (ii) To create new special provisions, with similar wording as SP 559, 604, 605, 606 and 608 in Chapter 3.3 and to add them to column 6 of the Dangerous Goods List of the Model Regulations for the following entries:
- SP XX1 (559): UN 3212;
 - SP XX2 (604): UN 1450 and UN 3213;
 - SP XX3 (605): UN 1461 and UN 3210;
 - SP XX4 (606): UN 1462;
 - SP XX5 (608): UN 1482 and UN 3214.

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¹ It is proposed to take up the contents of these special provisions also in the UN Model Regulations.