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Working Party on the Transport
of Dangerous Goods

Joint Meeting of the RID Safety Committee
and the Working Party on the Transport
of Dangerous Goods
(Geneva, 9-13 September 2002)

**COMMENTS BY SWITZERLAND ON DOCUMENT
TRANS/WP.15/AC.1/2002/2/REV.1-OCTI/RID/GT-III/2002/2/REV.1**

Transmitted by the Central Office for International Carriage by Rail (OCTI)*

The secretariat has received from the Central Office for International Carriage by Rail (OCTI) the proposal reproduced below.

* Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2002/27.

In principle Switzerland supports the creation of a special provision VWxx/VVxx for the carriage of substances contaminated by PCBs and PCTs. However, it questions whether the assignment to the UN numbers as given in document TRANS/WP.15/AC.1/2002/2/Rev.1-OCTI/RID/GT-III/2002/2/Rev.1 is correct, at least with reference to UN Nos. 2315 and 3151 which are liquids. Switzerland therefore proposes the inclusion of an entry in 2.2.9.1.5 assigning soil contaminated by PCBs/PCTs or waste containing PCBs/PCTs to UN No. 3152.

Switzerland also requests consideration of whether the expression “[solids]” in square brackets in special provision VWxx/VVxx can be replaced by “soil contaminated by PCBs/PCTs and solid wastes containing PCBs/PCTs”.

It will further be necessary to solve the question of whether, as in packing instruction P906, absorbent material should be added to absorb liquids in trays or containers if there is a risk that escaping liquid could accumulate in the soil. Lastly, it needs to be considered whether the term “leakproof” means the prevention of liquid entering or escaping from the container or both. In any case, it needs to be ensured that rainwater cannot enter the tray.

Germany uses P906, which does not go far enough, for its argument, and a closer look will show that a number of questions remain open. Regardless of the result of the discussion on document-/2002/2/Rev.1, the question arises whether a document should not be submitted to the United Nations for the purpose of the review of P906.
