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Working Party on the Transport of Dangerous Goods
(Bern, 24-28 March 2003)

DEFINITION OF PACKING GROUP FOR SUBSTANCES OF CLASS 3

Transmitted by the European Council of Chemical Manufacturers' Federation (CEFIC)

SUMMARY	
Executive Summary:	Bring the definitions for Packing Group of substances and articles of Class 3 in RID/ADR, in line with those that are used in the UN Model Regulations.
Action to be taken:	Amend the definitions for Packing Group I, II and III in subsection 2.2.3.1.3, and remove Notes 5 and 6 in subsection 2.2.3.1.1 and Footnotes b and c in section 2.2.8.3 as they will have become redundant.
Related documents:	TRANS/WP.15/AC.1/2002/31

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Introduction

At the Joint Meeting in Geneva, 9-13 September 2002, Cefic introduced document TRANS/WP.15/AC.1/2002/31 proposing to bring the definitions of Packing Groups I, II and III for substances of Class 3 in line with those of the United Nations Model Regulations.

Despite the support of many delegations, the Joint Meeting did not support the proposal as there were some doubts on whether this change would lead to any re-classification of flammable corrosive liquids and on whether the new provisions would still conform to the general provisions of Part 2.

These concerns have been addressed:

- according to the new definition, flammable liquids with a FP<23°C, which are highly corrosive and have a BP>35°C, would be assigned to Class 8, PG I whereas the current definition would assign these to Class 3, PG I.

At the Joint Meeting held in March 2002 the note 6 of subsection 2.2.3.1.1 was revised to say that substances which have a boiling point of more than 35 °C are substances of Class 8. This was in line with the rules of the precedence of hazards table.

However all highly corrosive liquids of Class 3, PG I with a FP<23°C have a BP<35°C. Therefore this proposal will not lead to any re-classification of substances.

- UN 2734 Amines, liquid, corrosive, flammable, n.o.s., UN 2734 Polyamines, liquid, corrosive, flammable, n.o.s. and UN 2920 Corrosive liquid, flammable, n.o.s., are the appropriate entries for PG I and PG II in Class 8.

UN 2733 Amines, liquid, flammable, corrosive, n.o.s., UN 2733 Polyamines, liquid, flammable, corrosive, n.o.s. and UN 2924 Flammable liquid, corrosive, n.o.s., are the appropriate entries for PG I, PG II and PG III in Class 3.

All these entries are in line with the table of precedence of hazards and therefore Note 6 of subsection 2.2.3.1.1 and Footnote b of subsection 2.2.8.3 can be deleted.

Proposal

Therefore the following is proposed:

- (a) Amend the definitions for Packing Group I, II and III in subsection 2.2.3.1.3 to read as follows:

Packing Group	Flash Point (closed cup)	Initial Boiling Point
I	--	<35°C
II	< 23°C	>35°C
III	≥23°C ≤61°C	>35°C

(b) Delete the following Notes and Footnotes, which apply to liquids that are flammable and corrosive.

- Note 5 of subsection 2.2.3.1.1
- Note 6 of subsection 2.2.3.1.1
- Footnote c of subsection 2.2.8.3
- Footnote b of subsection 2.2.8.3.

Justification

- The adoption of these definitions does not result in the need to reclassify substances in RID/ADR. Indeed the use of this new definition and the table of precedence of hazards results in an identical classification of flammable corrosive liquids, even without the 2 Notes and 2 Footnotes.
- There is no difference in the classification of substances between the Dangerous Goods Lists of RID/ADR and the UN Model Regulations. The adoption of this proposal would therefore be a further step towards modal harmonisation as the UN definition is already used in the IMDG code and IATA Dangerous Goods Regulations
- The adoption of the new definition of the Packing Groups for Class 3 in RID/ADR does not affect the classification of flammable toxic liquids. The table of precedence of hazards together with Notes 3 and 4 of subsection 2.2.3.1.1 and Footnotes j and k of subsection 2.2.61.3 cater for exceptions related to use as pesticides and difference between oral and dermal toxicity.

Safety implications

None.

Feasibility

No problem as there is no need for re-classification of substances.

Enforceability

No problem.
