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**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

**Working Party on the Transport  
of Dangerous Goods**  
(Seventy-fifth session,  
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**Table A of Chapter 3.2 and Chapter 7.3 Special Provisions VV9a and VV9b**

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

**Summary:**

For substances of UN 3288 (toxic inorganic solids), class 6.1, PG III, the special provision VV9b applies for carriage in bulk. The Multilateral Agreement M106, however, permits also the use of sheeted vehicles. As this Multilateral Agreement will expire on 1 September 2005, a proposal is needed to implement the provision of this Multilateral Agreement before that date.

More generally, a proposal is made that VV9a should apply also to all other substances, which have been allocated VV9b.

**Action:**

CEFIC proposes to amend the special provisions VV9a and VV9b.

**Introduction:**

ADR currently allocates special provision VV9b of chapter 7.3 to UN 3288, class 6.1, PG III, but Multilateral Agreement M106 permits its carriage in sheeted vehicles as well. This means that in fact provision VV9a applies to UN 3288, PG III.

**Proposal 1**

Replace special provision VV9b by special provision VV9a for UN 3288 PG III in Table A of Chapter 3.2.

A more general look at the allocation of special provisions VV9a and VV9b shows that:

- a lot of substances (some 180) of classes 6.1 and 8, PG II and III, are permitted to be carried in bulk in accordance with special provision VV9b of chapter 7.3 of the ADR;
- only five entries are permitted to be carried in bulk in accordance with special provision VV9a (i.e. allowing transport also in sheeted vehicles) of chapter 7.3. These five substances belong to class 6.1 PG III and class 8 PG II and are listed in the annex of this document.

A comparison of especially two UN numbers shows that there is an inconsistency in the allocation of the special provisions VV9a and VV9b:

- for substances of UN 1794 LEAD SULPHATE with more than 3% free acid, PG II, special provision VV9a applies. This means that they can be transported in sheeted vehicles;
- for the same substance with 3% or less free acid, to be classified as UN 2291 LEAD COMPOUND, SOLUBLE, N.O.S., 6.1, PG III or as UN 3288 TOXIC SOLID, INORGANIC, N.O.S., 6.1, PG III, special provision VV9b applies. This means that it is not permitted to carry these less dangerous goods in bulk in sheeted vehicles (with the exception of UN 3288 under M106 as mentioned above).

### **Proposal 2**

To solve this contradiction CEFIC proposes the following.

1. The special provision VV9b in chapter 7.3 should be deleted.
2. The special provision VV9a should read VV9.
3. As a consequence of the first two proposals, the entry in column 17 of Table A of Chapter 3.2, should read VV9 for all UN numbers where the special provisions VV9a or VV9b are shown.

### **Justification:**

These amendments will be a harmonization with the RID, which has only one special provision VV9 that is the equivalent of VV9a in ADR.

There have been no reports of incidents with dangerous goods of UN 3288 PG III in sheeted vehicles (carried in accordance with the Multilateral Agreement M106).

There are no safety reasons for not permitting the carriage of less dangerous substances in sheeted vehicles.

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AnnexUN entries with special provision VV9a in Table A

<b>UN No.</b>	<b>Name and description</b>	<b>Class</b>	<b>Classification Code</b>	<b>Packing group</b>
	<b>3.1.2</b>	<b>2.2</b>	<b>2.2</b>	<b>2.1.1.3</b>
<b>(1)</b>	<b>(2)</b>	<b>(3a)</b>	<b>(3b)</b>	<b>(4)</b>
1564	BARIUM COMPOUND, N.O.S.	6.1	T5	III
1794	LEAD SULPHATE with more than 3% free acid	8	C2	II
1884	BARIUM OXIDE	6.1	T5	III
2506	AMMONIUM HYDROGEN SULPHATE	8	C2	II
2509	POTASSIUM HYDROGEN SULPHATE	8	C2	II