



**Economic and Social  
Council**

Distr.  
GENERAL

ECE/TRANS/WP.15/AC.1/2009/2  
18 December 2008

Original: ENGLISH

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**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods

Geneva, 23-27 March 2009  
Item 5 of the provisional agenda

**HARMONIZATION WITH THE UN MODEL REGULATIONS ON THE TRANSPORT  
OF DANGEROUS GOODS**

Proposal to remove Special Provision 274 from the entries for Medicines

Transmitted by the European Chemical Industry Council (CEFIC) )<sup>1,2</sup>

**SUMMARY**

Executive summary: The purpose of this proposal is to harmonize the provisions of RID/ADR/ADN with these of the UN Model Regulations and other modal regulations regarding the requirement to supplement the Proper Shipping Name with the technical name (SP 274)

Action to be taken: Remove 274 from column 6 (Special Provisions) in Table A for UN entries 1851, 3248 and 3249 (PG II and III for all 3 entries)

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<sup>1</sup> 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)).

<sup>2</sup> Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2009/2.

Related documents:	ECE/TRANS/WP.15/AC.1/2008/3 (CEFIC) ST/SG/AC.10/C.3/2008/25 and UN/SCETDG/33/INF.3 (CEFIC) ST/SG/AC.10/C.3/2008/63 (CEFIC) INF.55 (USA) submitted at the 33 <sup>rd</sup> session of the UN Sub-Committee of Experts on the Transport of Dangerous Goods.
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### Background

1. At the March 2008 session of the Joint Meeting, CEFIC presented document ECE/TRANS/WP.15/AC.1/2008/3, which was the result of earlier discussions in the Joint Meeting and of an informal group, which reviewed the differences in the assignment of SP 274 (which requires the Proper Shipping Name to be supplemented by the technical name) between RID/ADR/ADN and the UN Model Regulations and other modal regulations like the IMDG Code and the ICAO TI. Based on a number of objective criteria (listed in ECE/TRANS/WP.15/AC.1/2008/3) the Joint Meeting adopted the proposals to remove 274 from column 6 in Table A numbers in order to align RID/ADR/ADN with the UN Model Regulations.
2. At the same time the Joint Meeting confirmed that maintaining the assignment of SP 274 to 81 substances was justified. In order to achieve intermodal harmonization it requested CEFIC to submit to the UN Sub-Committee of Experts on the Transport of Dangerous Goods (UNSCETDG) a proposal to add 274 to column 6 of the dangerous Goods List of the UN Model Regulations for these 81 substances.
3. CEFIC therefore introduced documents ST/SG/AC.10/C.3/2008/25 and INF.3 (33<sup>rd</sup> session, UN Sub-Committee). At the July 2008 session of UNSCETDG the proposal was discussed in a lunchtime working group but no agreement could be reached. Experts were invited however to send comments to CEFIC. As no comments were received CEFIC re-introduced its proposal as document ST/SG/AC.10/C.3/2008/63 at the December (34<sup>th</sup>) session of UNSCETDG.
4. The proposal was adopted by the UNSCETDG and SP 274 will apply to all the substances, listed in ST/SG/AC.10/C.3/2008/63 except for the 6 entries for Medicines (UN 1851, 3248 and 3249 – all 3 have both PG II and III) for which the expert from the United States of America had introduced (at a rather late stage) informal document INF.55.
5. This informal document stated that the requirement for SP 274 for medicines was carefully debated in the past on the basis of documents ST/SG/AC-10/C.3/R.109, and ST/SG/AC.10/R.284, submitted during the Sub-Committee's sixteenth session by the expert from the United Kingdom and the expert from Canada, respectively. Furthermore the current Special Provision 220 which is applied to MEDICINE, LIQUID, FLAMMABLE, TOXIC, N.O.S. (UN 3248), specifically requires a technical name only for the flammable constituent of the medicine. This limitation was added by the Sub-Committee to address concerns over the disclosure of controlled medicinal substances whose identity in transport could lead to practical and logistical problems including theft and unauthorized use and distribution.

6. These arguments were accepted (also by the delegations of most countries that are Contracting Party to RID/ADR) and therefore SP 274 was not assigned to the entries for Medicines.

#### Proposal

7. In order to achieve complete harmonization with the UN Model Regulations it is proposed to add SP 274 in column 6 of Table A for:

UN 1851 MEDICINE, LIQUID, TOXIC, N.O.S (PG II and III)

UN 3248 MEDICINE, LIQUID, FLAMMABLE, TOXIC, N.O.S. (PG II and III)

UN 3249 MEDICINE, SOLID, TOXIC, N.O.S. (PG II and III)

#### Justification

8. This harmonisation between all modal regulations will remove any problems in the intermodal transport of such substances, where the first leg of a journey may not require supplementing the Proper Shipping Name with the technical name, whereas the second part of the journey may do

#### Safety implications

9. No problems are foreseen

#### Feasibility

10. No problems are foreseen

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