

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

5 August 2011

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

Geneva, 13-23 September 2011

Item 4 of the provisional agenda

Harmonization with the United Nations Model Regulations on the Transport of Dangerous Goods

Draft proposals of amendments to RID/ADR/ADN

Comments on doc 2011/30/Add.1

Transmitted by the European Chemical Industry Council (CEFIC)

1. The UNECE secretariat has prepared a draft proposal of amendments to RID/ADR/ADN on the basis of the decisions taken by the UN Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals at its December 2010 session.

2. Regarding the new provisions related to chemicals under pressure, Cefic noticed deviations from the original text in the UN Model Regulations, which can lead to confusion and therefore proposes two changes (new text is underlined – obsolete text has been struck through) in the consequential amendments for chemicals under pressure

Amendment 1

2.2.2.1.2 Insert a new subdivision at the end to read as follows:

"8. Chemicals under pressure: liquids, pastes or powders, pressurized with a propellant that meets the definition of a compressed or liquefied gas and mixtures thereof".

Amendment 2

Add a new 2.2.2.1.7 to read as follows:

"2.2.2.1.7 Chemicals under pressure

...

NOTE 2: *Chemicals under pressure with contents meeting the criteria for packing group I for toxicity or corrosivity ~~or with contents meeting both the criteria for packing group II or III for toxicity and for packing group II or III for corrosivity~~ shall not be accepted for carriage under these UN numbers.*

3. The justification for amendment 1 can be found in SP 362 of the UN Model Regulations, which has not been taken over by RID/ADR. Paragraph (a) of SP 362 contains the following text “Flammable components are flammable liquids and liquid mixtures, flammable solids and solid mixtures or flammable gases and gas mixtures meeting the following criteria ...”

4. The justification for amendment 2 can be found in the fact that the absence of a UN number for toxic AND corrosive chemicals under pressure already prohibits the carriage of such substances. The corresponding paragraph (c) of SP 362 in the UN Model Regulations also does not make reference to components which are both toxic and corrosive. If only one of the hazards apply, packing group II and III are allowed.
