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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

Bern, 18–22 March 2013

Item 7 of the provisional agenda

Future work

Proposed amendment of Chapter 3.2 Table A – Dangerous Goods List

Transmitted by the International Road Transport Union (IRU)^{1, 2}

Introduction

1. Since 1 January 2009, the environmentally hazardous marking is required for all substances meeting the classification criteria set out in sub-section 2.2.9.1.10.
2. At the present time, due to an imprecision in Table A providing the list of dangerous goods, the “environmentally hazardous” marking is freely interpreted for many dangerous goods.
3. Taking as an example a common product, hypochlorite solution (UN No 1791), safety data sheets sometimes bear the specification “environmentally hazardous”, and sometimes not.
4. In Switzerland, the Federal Office of Public Health (FOPH) considers hypochlorite solution (bleach) as environmentally hazardous only above a 25% concentration, whereas hypochlorite solution is generally carried in a 13-14% concentration (see also informal document INF.6).

¹ In accordance with the programme of work of the Inland Transport Committee for 2010-2014 (ECE/TRANS/208, para.106, ECE/TRANS/2010/8, programme activity 02.7(c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2013/26.

5. The IRU and its members therefore wonder whether or not such carriage should be marked as “environmentally hazardous substances”.

Enforcement

6. To support the RID/ADR’s objective to improve competitiveness, safety, energy efficiency and security in the transport sector, the IRU requests the experts in the Joint Meeting to develop a special provision applying to all environmentally hazardous substances in Chapter 3.3. of RID/ADR to require an appropriate marking.
