

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, 19–29 September 2017

11 September 2017

Item 4 of the provisional agenda

Harmonization with the United Nations

Recommendations on the Transport of Dangerous Goods

Amendment of provision 2.2.51.2.2 for fertilizers

Transmitted by Fertilizers Europe

Summary

Executive summary: Add further provisions to the amendments proposed by Sweden concerning provision 2.2.51.2.2, thirteenth indent, to align with the United Nations Model Regulations while keeping the current level of safety.

Related documents: ECE/TRANS/WP.15/AC.1/2017/35, INF.12 and ECE/TRANS/WP.15/AC.1/2017/26/Add.1, report of the Ad Hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods.

Background

1. The twentieth edition of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations contains major changes to the provisions relating to ammonium nitrate (AN) based fertilizers. These changes mainly comprise a move of the current composition requirements for classification of AN-based fertilizers as UN number 2067 or 2071 from Special Provisions (SP) 307 and 193 to a flowchart in a new Section 39 of the UN Manual of Tests and Criteria. As the expert from Sweden has commented in his paper, the majority of these changes are rather straightforward to incorporate into the RID/ADR/ADN transport modes; however, one important consequential amendment deserves special attention.

2. Provision 2.2.51.2.2 of the RID/ADR/ADN lists substances that are not accepted for carriage in Class 5.1 and its thirteenth indent specifies that certain fertilizers are not accepted for carriage in this class, except under certain conditions. With the changes made to SP 307 in the 20th edition of the United Nations Recommendations, the "values" referred to in provision 2.2.51.2.2 no longer exist. They are instead found in various boxes in the new

flowchart in Section 39 of the Manual of Tests and Criteria, to which SP 307 of the Model Regulations now refers as follows:

"This entry may only be used for ammonium nitrate based fertilizers. They shall be classified in accordance with the procedure as set out in the Manual of Tests and Criteria, Part III, Section 39."

3. Sweden has proposed a solution to this issue in ECE/TRANS/WP.15/AC.1/2017/35 and INF 12. Fertilizers Europe is much appreciative of Sweden's initiative and efforts in this regard.

Problem

4. Fertilizers Europe has identified an area of concern based on the industry's practical experience.

5. The concern is with regard to the likely effects of unplanned incidents or transport accidents. Millions of tonnes of these fertilizers are transported by road annually and on rare occasions incidents happen, some of which result in contamination of a portion of the load. If the contaminant is spilled oil or some other organic, the current provision will require the load to be treated as an explosive and transported under Class 1 provisions. The industry is of the opinion that in such circumstances it would be prudent to make an assessment of the situation involving the competent authority and have the flexibility to transport it under its original class e.g. 5.1 with appropriate controls. To achieve this Fertilizers Europe wishes to suggest incorporation of additional text as shown in italics below:

- ammonium nitrate based fertilizers with compositions that lead to exit boxes 4, 6, 8, 15, 31, or 33 of the flowchart of paragraph 39.5.1 of the Manual of Tests and Criteria, Part III, Section 39, unless they have been assigned a suitable UN number in Class 1. *As an exception, in situations where due to an incident product gets contaminated resulting in the above mentioned compositions, the contaminated fertilizer can be assigned a suitable UN number in Class 5, Division 5.1, provided that the suitability for transport is demonstrated and this is approved by the competent authority.*

Concluding remark

6. Remediating the deviation that exists between the twentieth edition of the Model Regulations and the RID/ADR/ADN 2017 in not allowing certain fertilizer compositions to be carried in Class 5.1 should take into consideration the industry's on-going practices and concerns as described in this paper, when undertaking the next revision.
