



**Economic and Social
Council**

Distr.
GENERAL

TRANS/WP.15/AC.1/2001/42
21 June 2001

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

**Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods**
(Geneva, 10-14 September 2001)

MIXED PACKING (Column 9(b))

Proposal from the Government of the United Kingdom */

During the restructuring of RID/ADR, the UK proposed a simplification of the mixed packing requirements (TRANS/WP.15/AC.1/1999/41). Although received sympathetically by the Joint Meeting, it was felt that such a proposal required more detailed consideration than was at that time available.

Proposal 1

The UK believes that the original proposal should now once more be considered and that Column 9(b) should be deleted from Table 3.2A and Section 4.1.10 deleted from Part 4.

Justification

1. It is agreed that unless there are pressing safety concerns the Joint Meeting should follow the UN Recommendations. The current UN text is less restrictive than RID and ADR, and puts the onus on the consignor to ensure that he is aware of any hazards involved in mixed packing.
2. Goods entering or leaving the territory of RID/ADR contracting parties by sea or air are subject only to the mixed packing provisions of the IMDG Code or the ICAO Technical Instructions, which are the same as the UN Recommendations.

*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT/III/2001/42.

3. Most of the RID/ADR mixed packing provisions relate to the era before the introduction of UN tested packagings and now need to be reconsidered given the safety assessment of the packaging design types.
- 4 4.1.1.10.1 (sic) - should be 4.1.10.1 – error in ADR - contains the proviso “provided that they do not react dangerously with one another”. This requirement is covered already in 4.1.1.6.

Proposal 2

If Proposal 1 is not deemed acceptable, some parts of the existing MP requirements should be allocated to different parts of the text as shown below.

Justification

If specific mixed packaging requirements are to be set out, they would be better placed in the packing instruction itself, as an additional section, or in the special provisions, or in the special conditions of packing for the appropriate class e.g. 4.1.7, especially as Column 9(b) only applies to combination packagings.

Comments on specific provisions

- (a) MP7 – 19 in 4.1.10 all contain the phrase “provided they do not react dangerously with one another”. This makes the text advisory and of little benefit beyond what is stated in 4.1.1.6. The quantity limitations shown in the various provisions are no longer defensible as they have not taken account of the UN testing provisions.
- (b) MP1 relates to Class 1, Compatibility Group L. With the exception of 2 UN numbers (0248 and 0249), packing instruction P101 applies which needs Competent Authority approval, so the further requirements of MP1 are unnecessary. For UN 0248 and 0249 packing instruction P144 applies so the text of MP1 can be added to special packing provision PP77 which applies to these 2 UN numbers.
- (c) MP2 is used for Class 1 n.o.s. entries for which packing instruction P101 applies. As P101 requires Competent Authority approval, the text of MP2 is unnecessary for these entries. If the text for MP2 is still required for very hazardous substances in other classes, it should be transferred to the relevant packing instruction or to a new special packing provision within the packing instruction.
- (d) MP3. If it is felt necessary to retain this, the text should be transferred as a new special packing provision for UN 1802 in packing instruction P001 and for UN 1873 in packing instruction P502.
- (e) MP4 is for Class 5.2 only. Is it reasonable to prohibit the mixed packing of ALL organic peroxides? If this is still required the additional text should be added to the “Additional Requirements” in packing instruction 520.
- (f) MP5 is for Class 6.2 and then only 2814 and 2900. With the use of the word "may", this contradicts P620 which makes combination packaging mandatory. The statement “They shall not be packed together with other goods” should be in P620 at UN. The last part of the sentence will be superfluous from 2003 as there will be a new entry for Diagnostic specimens. This can therefore be deleted.

- (g) MP6. For UN 3245, the text of MP6 should be added to packing instruction P904. (RID and ADR appear to allocate IBC08 – surely this should be IBC99 as per UN and IMDG Code?)

For UN 3291, the text of MP6 should be added to packing instruction P621 and LP621. (Does the 2nd sentence regarding coolants really apply to clinical waste? – if not only the 1st sentence is necessary in this case.)

- (h) MP20 to 24 only apply to Class 1 but really seem to be an extension to MP1. Some of these provisions have been applied to 1.4 – substances and articles which present no significant hazard.

MP23 applies to UN 0193 which "shall not be packed with other goods which are not subject to RID/ADR", but as the goods are Signals railway track explosives, surely they will be carried to the repair site with other materials in the same box.

If these requirements are needed they should be rationalised on the basis of Division and Compatibility Group and integrated into 4.1.5.
