

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

1 September 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 Recommendations on the Transport of Dangerous Goods

## Outcome of the Sub-Committee of Experts on the Transport of Dangerous Goods on its thirty-ninth session

### Note by the secretariat

#### Introduction

The Sub-Committee of Experts on the Transport of Dangerous Goods considered the issues raised by the Ad Hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods (document ECE/TRANS/WP.15/AC.1/2011/30).

The secretariat reproduces hereafter relevant paragraphs of ECE/TRANS/WP.15/AC.1/2011/30 with comments from the Sub-Committee in bold underlined (excerpt from the report of the Sub-Committee at its thirty-ninth session ST/SG/AC.10/C.3/78).

#### "Solution or mixture"

9. The Group noted that RID, ADR and ADN use in most of their provisions the phrase "solution or mixture" while the same phrase appears as "mixture or solution" in the equivalent provisions of the Model Regulations. The Joint Meeting may wish to consider whether it would be appropriate to align RID, ADR and ADN with the Model Regulations in this respect.

**Solutions and mixtures are inconsistently referred to as "solutions and mixtures" or "mixtures and solutions" both in the Model Regulations and in RID/ADR/ADN, but there is no need to amend the Model Regulations for such an editorial inconsistency.**

#### Glossary of Class 1 names

15. For these reasons, it seems that (a) the new definition for "AUXILIARY EXPLOSIVE COMPONENT ISOLATED" should not appear in the RID/ADR/ADN Glossary since there is no UN number corresponding to such a name; (b) this name, as well as the name "EXPLOSIVE, EXTREMELY INSENSITIVE SUBSTANCES (EIS)" should appear in lower case in the Model Regulations Glossary.

**The designations "AUXILIARY EXPLOSIVE COMPONENT ISOLATED" and "EXPLOSIVE, EXTREMELY INSENSITIVE SUBSTANCES (EIS)" should appear**

in lower case in the Glossary of the Model Regulations (see ST/SG/AC.10/C.3/78 Annex I).

### **Medical equipment (Note to 2.2.62.1.5.3/UN: Note to 2.6.3.2.3.3)**

18. It was noted that the new NOTE added to 2.6.3.2.3.3 of the Model Regulations was not necessary, because medical equipment, whether or not drained of free liquid, is not subject to the requirements of RID/ADR/ADN if the conditions of 2.2.62.1.5.3 (UN 2.6.3.2.3.3) are met.

19. It was suggested that the intent of the NOTE was to state that when medical equipment has been drained from free liquid, the conditions of 2.2.62.1.5.3 (UN 2.6.3.2.3.3) are deemed to be met. However the Group felt that this interpretation did not correspond to the text of the NOTE and the views of the United Nations Sub-Committee should be sought first before validating such an interpretation by a different text in RID/ADR/ADN.

**The note added to 2.6.3.2.3.3. is wrong and should be corrected to read "Medical equipment which has been drained of free liquid is deemed to meet the requirements of this paragraph and is not subject to these Regulations" (see ST/SG/AC.10/C.3/78 Annex I).**

*Note by the secretariat: This correction is already included in ECE/TRANS/WP.15/AC.1/2011/30/Add.1 (text in square brackets).*

### **Transitional measures for the carriage of lithium batteries**

22. The Group agreed that a new transitional measure 1.6.1.23 should be added for lithium cells and batteries manufactured before 1 July 2013 which have not been tested in accordance with the new test provisions. The United Nations Sub-Committee of Experts should be consulted for determining the transitional period.

**The new provisions for testing lithium batteries need not to be applied to cells and batteries manufactured before 1 January 2014 (The Sub-Committee also agreed that cells and batteries manufactured before 1 January 2014 in accordance with the provisions contained in the fifth revised edition of the Manual of Tests and Criteria could continue to be transported after that date).**

*Note by the secretariat: Corresponds to 1.6.1.24 in ECE/TRANS/WP.15/AC.1/2011/30/Add.1.*

### **UN No. 3497 Krill meal**

23. The United Nations Sub-Committee should be consulted to determine whether checking the temperature before loading should be required for the Packing Group III entry, i.e. whether special provision 300 should be assigned to the Packing Group III entry.

**The Sub-Committee agreed that Special Provision 300 should have been assigned to the Packing Group III entry for Krill meal, UN No. 3497 (see ST/SG/AC.10/C.3/78 Annex I).**

*Note by the secretariat: This correction is already included in ECE/TRANS/WP.15/AC.1/2011/30/Add.1.*

## Chemicals under pressure (UN Nos. 3500 to 3505)

28. The Group considered that, as for aerosols, gases identified as pyrophoric in Packing Instruction P200 should not be used as propellants. This is not mentioned in special provisions 63, para (d) and 362, para (b) of the Model Regulations and should be brought to the attention of the United Nations Sub-Committee.

**The Sub-Committee agreed that pyrophoric gases should be prohibited as propellants for aerosols and as components of chemicals under pressure, and the secretariat was invited to prepare a proposal of amendment to special provisions 63 and 362 accordingly.**

*Note by the secretariat: Corresponds to Note 1 to 2.2.2.1.7 in ECE/TRANS/WP.15/AC.1/2011/30/Add.1.*

## Excepted quantities (new paragraph 3.5.1.4)

31. The Group noted that the new paragraph 3.5.1.4, as drafted in the Model Regulations, was not suitably drafted for regulatory purposes in the sense that excepted quantities of dangerous goods assigned to codes E1, E2, E4 and E5 as described in 3.5.1.4 remain subject to certain transport conditions and therefore remain subject to RID/ADR/ADN. The proposed revised wording should be brought to the attention of the United Nations Sub-Committee.

**There was no consensus on the best way to draft paragraph 3.5.1.4. Some experts felt that the way it is drafted is consistent with other exemptions which can be found in special provisions, while others felt that the goods referred to in this paragraph remained subject to certain provisions of the Regulations and therefore could not be described as not subject to the Regulations.**

## Packing Instructions PIXX

32. It was noted that the heading of columns of packing instructions for explosives did not correspond to that of the Model Regulations since, in RID and ADR, the words "and arrangements" have been added to "Inner packagings", "Intermediate packagings" and "Outer packagings". These words had been added in RID and ADR because some "arrangements", e.g. "Dividing partitions" did not seem to meet the definition of inner packaging. It was agreed that the issue should be brought to the attention of the United Nations Sub-Committee.

**The Sub-Committee considered that there was no need to amend the headings of the packing instructions PIXX to reflect the possibility of use of arrangements such as dividing partitions described in the column, which form parts of packagings.**

## Packing Instruction P201, paragraph (i)

33. The Group noted that paragraph (1) of Packing Instruction P201 in the Model Regulations refers to "Compressed gas cylinders and gas receptacles". The Group felt that a reference to "Cylinders, tubes and pressure drums" would be more appropriate and it was agreed to seek the advice of the United Nations Sub-Committee.

**The Sub-Committee considered that the word "compressed" in paragraph (1) of P201 was not needed, but reference to tubes and pressure drums would not be appropriate**

**since they are not used for the transport of samples. The wording could be "cylinders and gas receptacles" (see ST/SG/AC.10/C.3/78 Annex II).**

*Note by the secretariat: Included in the Draft amendments to the seventeenth revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations.*

### **Packing Instructions P902 and LP902 (Additional requirements)**

34. The Group felt that the words "Pressure vessel" in the Model Regulations should be replaced by "Pressure receptacle" since there is no definition of "pressure vessel" in Section 1.2.1. The United Nations Sub-Committee should be informed accordingly.

**The representative of CGA explained that the term "pressure vessel" is used by the industry to refer to static or stationary pressure receptacles rather than to transportable pressure receptacles. However, since the definition of pressure receptacle in 1.2.1 covers these "pressure vessels", and since this different terminology causes translation problems, it was agreed to replace "pressure vessel" by "pressure receptacle" wherever necessary (see ST/SG/AC.10/C.3/78 Annex I).**

*Note by the secretariat: This correction is already included in ECE/TRANS/WP.15/AC.1/2011/30/Add.1 (for SP280, P301, P902 and LP902).*

### **Packing Instruction P903, paragraph (4)**

35. The Group recommends the deletion of the last sentence which states that "when active, these devices shall meet defined standards for electromagnetic radiation to ensure that the operation of the device does not interfere with aircraft systems". It did not seem that such a requirement was a packing requirement and that it was relevant for inland transport. Should the carriage of such active devices be prohibited, the prohibition should rather appear in 2.2.9.2.

**The Sub-Committee agreed that the conditions of transport of devices such as radio frequency identification tags when active should be further discussed during the biennium and that the last sentence of paragraph (4) of packing instruction P903 might not have been located at the appropriate place in the Regulations.**

*Note by the secretariat: This text is kept in square brackets in ECE/TRANS/WP.15/AC.1/2011/30/Add.1.*

### **Portable tank instruction T50**

36. The Group considered that the words "Maximum filling ratio" in the heading of the last column of portable tank instruction T50 was not appropriate in the Model Regulations since the figures given in that column express a filling density in kg per litre of capacity rather than a filling ratio. This should be brought to the attention of the United Nations Sub-Committee.

**The representative of CGA said that the term "filling ratio" used in T50 is correct because it is defined in section 1.2.1.**

### **Section 5.5.3**

37. The Group considered that 5.5.3.1.3 should refer to "tanks or MEGCs" rather than to portable tanks only. The United Nations Sub-Committee should be invited to consider

inserting the words "or MEGCs" after "portable tanks" in the Model Regulations, unless these words had been omitted on purpose.

**The Sub-Committee agreed that 5.5.3.1.3 should refer to MEGCs in addition to portable tanks (see ST/SG/AC.10/C.3/78 Annex I).**

*Note by the secretariat: This correction is already included in ECE/TRANS/WP.15/AC.1/2011/30/Add.1.*

39. In 5.5.3.4.2, the word "packaging" was replaced by "package". This should be brought to the attention of the United Nations Sub-Committee.

**The Sub-Committee agreed that the word "packagings" in 5.5.3.4.2 should be replaced by "packages" (see ST/SG/AC.10/C.3/78 Annex I).**

*Note by the secretariat: This correction is already included in ECE/TRANS/WP.15/AC.1/2011/30/Add.1.*

### **Symbols on large packagings (6.6.3.3)**

40. The Group noted that the NOTE to 6.6.3.3 in the Model Regulations (proposed 1.6.1.2526 for RID/ADR/ADN) refers to "large packagings manufactured, repaired or remanufactured". However there is currently no definition for repaired large packagings and no provision for such repaired packagings. This should be brought to the attention of the United Nations Sub-Committee.

**The Sub-Committee noted that the NOTE to 6.6.3.3 contained a reference to repaired large packagings while there was no definition, nor provision, for repaired large packagings. Nevertheless there was no consensus on the need for deleting this reference, since the repair of large packagings could be an opportunity for displaying the stacking load symbol.**

### **Flexible bulk containers**

43. The Group noted that the acronym "FBC" was used only in the definition of "Bulk container" in 1.2.1 and in 6.8.5.5.1 of the Model Regulations. Therefore it was agreed not to introduce this acronym in RID, ADR and ADN.

**The Sub-Committee agreed that the acronym "FBC" should not be used in the provisions for the time being (see ST/SG/AC.10/C.3/78 Annex I).**

*Note by the secretariat: This correction is already included in ECE/TRANS/WP.15/AC.1/2011/30/Add.1.*

44. For 6.11.5.4.2 (6.8.5.4.2 of the Model Regulations), it was agreed to replace the words "packaging methods" by "containment methods" since a bulk container is not deemed to be a packaging.

**The Sub-Committee agreed that some corrections had to be made in section 6.8.5 (see ST/SG/AC.10/C.3/78 Annex I).**

*Note by the secretariat: This correction is already included in ECE/TRANS/WP.15/AC.1/2011/30/Add.1.*

**RID/ADR tank provisions**

46. For UN No. 2381, special provision 354 was placed between square brackets. The United Nations Sub-Committee should be invited to check whether it is appropriate to assign this special provision (which draws attention to the danger of toxicity by inhalation) for a packing group II substance.

**The Sub-Committee agreed that special provision 354 should not apply to packing group II substances (see ST/SG/AC.10/C.3/78 Annex I).**

*Note by the secretariat: This correction is already included in ECE/TRANS/WP.15/AC.1/2011/30/Add.1.*

---