

## **Economic Commission for Europe**

### **Inland Transport Committee**

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

7 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**

### **Mixed Loading Of Dangerous Goods Packed In Limited Quantities**

#### **Sporting Arms And Ammunition Manufacturers' Institute (SAAMI)**

## **I. Discussion**

1. In the most recent biennium ending in December 2010, the United Nations Recommendations on the Transport of Dangerous Goods Model Regulations were amended to include certain goods of Division 1.4 Compatibility Group S within the Limited Quantities regime. This change is being published in the 17th Edition of the Model Regulations.
2. Like the RID/ADR regulations, the UN Model Regulations prohibit the loading of Class 1 with other classes. Both include a general exception for Division 1.4 Compatibility Group S and certain specific exceptions, for example shipment together of Division 1.4 and Class 9 air bags. As shown in RID/ADR 3.4.1(g), the segregation table in 7.5.2.1 is not applied for Limited Quantities in RID/ADR and they may be mixed loaded with Class 1, even Compatibility Groups A & L.
3. Other regional or modal regulations do not prohibit the mixed loading of Class 1 with other classes to the same extent as RID/ADR or the UN Model Regulations, for example they generally allow mixed loading of Division 1.4 and certain loading with Division 1.3.
4. Due to the unique nature of goods in Class 1 compatibility groups A & L, most transport regulations harmonized with the Model Regulations prohibit the shipment of these goods with any other dangerous goods. These products include primary, waste and hypergolic explosives. In practice, it is unlikely for goods of Compatibility Groups A & L to ship with any other goods not directly related to their purpose, whether dangerous or non-dangerous goods; their shipments are likely to be in vehicles dedicated to their shipment.
5. Based on their level of safety, goods of Division 1.4 Compatibility Group S may generally ship with any other dangerous goods; however in keeping with all other dangerous goods they are also prohibited from shipment with Class 1 compatibility groups A & L. This segregation is based on the unique hazards of Class 1 compatibility groups A & L, not on any unique hazards of other dangerous goods including Compatibility Group S. The addition of certain Division 1.4 Compatibility Group S products to Limited Quantities would mean that they could now be shipped with Compatibility Groups A & L like other

Limited Quantities, and consideration must be given on whether to continue the current segregation.

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

6. In the report of the May meeting of the Working Party (ECE/TRANS/WP.15/AC.1/2011/30), the statement was made in paragraph 30: “The Group noted that, according to 7.1.3.2 of the Model Regulations, mixed loading of goods of Class 1 (except 1.4S) with goods of any other class (including those packed in limited quantities) is prohibited. According to 7.5.2 of RID/ADR, mixed loading prohibitions are based on danger labels, therefore they do not apply in the case of limited quantities. As a consequence, the Group proposes to add a new 7.5.2.4 prohibiting mixed loading of goods of Class 1 (except 1.4S) with limited quantities.”

### **Analysis**

7. Whereas the action proposed by the Working Party provides a solution to the mixed loading of Class 1 Compatibility Group S with Compatibility Groups A & L, it inadvertently changes a long-standing policy of the RID/ADR to allow the mixed loading of Limited Quantities with Class 1. No justification has been provided for this greater change. A modification to the proposed solution would solve the issue for A & L while maintaining the ability in general to ship Limited Quantities with Class 1. This can be done by adding a new 7.5.2.4 prohibiting mixed loading of goods of Class 1, Compatibility Groups A & L with Limited Quantities.

8. Due to the practical situation that Compatibility Groups A & L represent highly specialized shipments and may not travel in regular commerce, an option exists to take no action. The addition of certain Division 1.4 Compatibility Group S products to Limited Quantities does not decrease safety in this regard, as they are comparable in hazard to other classes which when transported as Limited Quantities are not segregated from Compatibility Groups A & L.

## **II. Proposal**

### **Option 1**

9. Add a new 7.5.2.4: “Goods of Class 1 in Compatibility Groups A and L shall not be loaded together in the same vehicle or container with limited quantities.”

10. A consequential amendment is required to 3.4.1(g) as follows: Part 7, Chapter 7.1 and 7.21, 7.2.2, 7.5.1 (except 7.5.1.4), 7.5.2.4, 7.5.7, 7.5.8, 7.5.9

### **Option 2**

11. Take no action.

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