

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

17 June 2013

Forty-third session

Geneva, 24–28 June 2013

Item 9 of the provisional agenda

Global harmonization of transport of dangerous goods regulations with the Model Regulations

Harmonization of RID/ADR/ADN with the 18th revised edition of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations

Note by the secretariat

1. The RID/ADR/ADN Joint Meeting ad hoc Working Group on the harmonization of RID/ADR/ADN with the United Nations Recommendations on the transport of Dangerous Goods met in Geneva from 24 to 26 April 2013. Its report and proposed amendments to the RID/ADR/ADN Joint Meeting will be submitted to the autumn session of the Joint Meeting (17-27 September 2013) under symbols ECE/TRANS/WP.15/AC.1/2013/31 (report) and -/Add.1 (proposed amendments).
2. During the working group session, some issues were raised and the secretariat was invited to bring them to the attention of the Sub-Committee for resolution before their discussion by the Joint Meeting.
3. The report is reproduced as annex I to this informal document and the Sub-Committee may wish to consider the issues raised in paragraphs 7-9, 10, 11, 12, 14, 18, 20, 22, 23, 25 and 28. Additional information and comments are provided in italics.
4. The Sub-Committee may also wish to consider the additional issues raised during the meeting of the working group which are reproduced in annex II.

Annex I

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

Note by the secretariat

I. General

1. The Ad Hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods met in Geneva from 24 to 26 April 2013 under the chairmanship of Mr. C. Pfauvadel (France).

2. Representatives of Belgium, France, Germany, Netherlands, Sweden, Switzerland, United Kingdom, the European Union, Intergovernmental Organisation for International Carriage by Rail (OTIF), Detergents and Maintenance Products (AISE), European Chemical Industry Council (CEFIC) participated in the session.

3. The session was held in English, without interpretation. The documentation prepared by the secretariat, including the agenda, was issued as informal documents which were made available on the website of the UNECE Transport Division as follows:

ECE/TRANS/WP.15/AC.1/HAR/2013/1/Rev.1	Harmonization with the United Nations Model Regulations on the Transport of Dangerous Goods
ECE/TRANS/WP.15/AC.1/HAR/2013/2	Additional comments and amendments
ECE/TRANS/WP.15/AC.1/HAR/2013/4	Note by the secretariat
ECE/TRANS/WP.15/AC.1/HAR/2013/5	Amendments to 2.2.3.1.4

4. The background documents were the report of the United Nations Economic and Social Council's Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals and annexes thereto, circulated by the secretariat as documents ST/SG/AC.10/40 and -Add.1-3.

5. The Ad Hoc Working Group adopted the provisional agenda prepared by the secretariat, ECE/TRANS/WP.15/AC.1/HAR/6.

II. Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations

6. The draft amendments to RID/ADR/ADN proposed by the Ad hoc Working Group are reproduced in the addendum to this report (ECE/TRANS/WP.15/AC.1/2013/31/Add.1). The Working Group agreed that the comments below should be brought to the attention of the Joint Meeting and some texts were placed between square brackets pending a decision by the Joint Meeting.

Chapter 1.1

7. In relation to the proposed new 1.1.3.10 [\[UN 1.1.1.9\]](#), the Group agreed to delete 1.1.3.2 (h) [\[UN last indent of 2.2.2.4\]](#) in favour of a new 1.1.3.10 (d) and to include a Note in 1.1.3.2 (c) stating that this exemption does not apply to lamps and cross-referencing 1.1.3.10. It was also noted that the 6-month transitional period of RID/ADR/ADN should be enough for implementation.

8. The Notes under 1.1.3.10 (b) (i) [\[and in SP 373\]](#) ~~and at the end of 1.1.3.10~~ were amended and it was decided that these amendments should be brought to the attention of the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods.

Proposal 1: *The Sub-Committee may wish to amend 1.1.1.9 accordingly as follows:*

“1.1.1.9 Lamps containing dangerous goods

The following lamps are not subject to these Regulations provided that they do not contain radioactive material and do not contain mercury in quantities above those specified in special provision 366 of Chapter 3.3:

(a) *Lamps that are collected directly from individuals and households when transported to a collection or recycling facility;*

(b) *Lamps each containing not more than 1 g of dangerous goods and packaged so that there is not more than 30 g of dangerous goods per package, provided that:*

(i) *the lamps are certified to a manufacturer’s quality management system;*

NOTE: ~~The application of ISO 9001:2008 may be considered acceptable~~ used for this purpose.

and

(ii) *each lamp is either individually packed in inner packagings, separated by dividers, or surrounded with cushioning material to protect the lamps and packed into strong outer packagings meeting the general provisions of 4.1.1.1 and capable of passing a 1.2 m drop test;*

(c) *Used, damaged or defective lamps each containing not more than 1 g of dangerous goods with not more than 30 g of dangerous goods per package when transported from a collection or recycling facility. The lamps shall be packed in strong outer packagings sufficient for preventing release of the contents under normal conditions of transport meeting the general provisions of 4.1.1.1 and that are capable of passing a drop test of not less than 1.2 m.*

(d) Lamps containing only gases of Division 2.2 (according to 2.2.2.1) provided they are packaged so that the projectile effects of any rupture of the bulb will be contained within the package.

NOTE: *Lamps containing radioactive material are addressed in 2.7.2.2.2(b).”*

Delete the last indent in 2.2.2.4 and add a note at the end to read:

“NOTE: This exemption does not apply to lamps. For lamps see 1.1.1.9.”

Consequential amendment:

In the English version, in 2.4.4.1 replace “light bulbs” by “lamps”.

9. It was noted that 1.1.3.10 (b) (i) referred to quality management systems, a term defined in the context of carriage of radioactive material, while other parts of the regulations referred to quality assurance programmes (e.g. the proposed new special provision 373, paragraph (a) (iii)). It was suggested that the United Nations Sub-Committee of Experts should consider the use of these terms throughout the Model Regulations.

Chapter 1.2

10. It was noted that the definition for *Large salvage packaging* was partly covered by the definition *Salvage packaging*. The United Nations Sub-Committee of Experts should be invited to consider this issue.

Chapter 1.7

11. The representative of the United Kingdom proposed not to accept the changes to the English version in 1.7.2.2 corresponding to paragraph 1.5.2.2 of the Model Regulations, and the introductory sentence in 1.7.6.1 corresponding to paragraph 1.5.6.1 of the Model Regulations, as they considered that these changes did not improve the text. The corresponding amendments are placed in square brackets.

12. Under 1.7.1.5.1 (a) [UN: 1.5.1.5.1 (a)] a reference to 5.1.2.1 [UN: 5.1.2] was included in square brackets since the provisions for overpacks seemed to be relevant for excepted packages. This should be checked by the United Nations Sub-Committee of Experts.

Section 2.2.3

13. The Ad hoc Working Group noted that RID/ADR/ADN texts differed from United Nations Recommendations. The two possible alternatives for 2.2.3.1.4 should be brought to the attention of the Joint Meeting, which should consider whether it is still relevant to deviate from the Model Regulations.

14. It was noted that certain references to ISO standards (e.g. to ISO 2431:1993) were out of date and should be updated.

Proposal 2: The Sub-Committee may wish to update the reference to ISO 2431 in section 32.4.3 of the Manual of Tests and Criteria and indicate which other standards should be updated in the Model Regulations and in the Manual of Tests and Criteria.

Section 2.2.7

15. It was noted that the International Atomic Energy Agency (IAEA) had deleted the words “and” or “or” between sub-paragraphs in many places; as a consequence it was not always clear whether all such sub-paragraphs were applicable or not. The secretariat was invited to check the meaning with the IAEA secretariat.

Chapter 3.2

16. It was noted that for UN No. 0222, W2 covers B2 in RID, but in ADR the V2 code allows the use of EX/II vehicles, i.e. vehicles which may be sheeted. However, B2 only allows the use of closed transport units. This could be further considered by the Working Party on the Transport of Dangerous Goods (WP.15).

17. For UN No. 3089, it was noted that B2 had been included for PG III. It was agreed to place V11/W11 in square brackets since this would allow the use of sheeted wagons/vehicles.

Chapter 3.3

18. For special provision 225 concerning fire extinguishers, it was decided that it would be more appropriate to refer to the provisions applied in the country of manufacture rather than the provisions of the country of manufacture since fire extinguishers may be manufactured in one country in accordance with the provisions applicable in the country in which they are to be exported. The same remark applies to special provision 594 which should be reviewed accordingly. The representative of Germany indicated that a Note should be added to indicate that cylinders used in fire extinguishing systems are not covered by UN No. 1044, and that he will submit a proposal to the Joint Meeting in this respect.

Proposal 3: The Sub-Committee may wish to amend SP225 accordingly:

At the end of SP225, amend the text before the indents to read “Fire extinguishers shall be manufactured, tested, approved and labelled according to the provisions applied in ~~of~~ the country of manufacture. ...”.

19. When discussing special provision 375, the Group noted that the International Maritime Organization (IMO) Editorial and Technical Group was considering the question of renaming environmental hazardous substances/marine pollutants as aquatic pollutants and that the outcome of the discussion would be of interest to the Joint Meeting.

20. For special provisions 376 and 377, it was suggested that the United Nations Sub-Committee of Experts should consider provisions for defining the size of markings required in special provisions.

21. The Ad hoc Working Group noted that special provision 636 for lithium cells and batteries should be reviewed in the light of new special provision 377 and new packing instruction P909. The industry should be consulted on this and to determine how to replace the reference to the gross mass of lithium cells and batteries by a reference to their Watt-hour capacity.

Chapter 3.4

22. The United Nations Sub-Committee of Experts should be informed that the transitional provisions contained in the Note under the marks in packing instructions P650 and P904 are not necessary since there is no change in the provisions.

Note: Also applicable for 3.5.4.3.

Appendix B (of the UN Model Regulations) (2.2.1.4 of RID/ADR/ADN)

23. For the definition of SAFETY DEVICES, PYROTECHNIC: UN No. 0503, it was decided to delete the words “or release-and-drive” because they were not understood by the Group.

Chapter 4.1

24. A question was raised as to whether P208, paragraph (1), authorized both UN cylinders and RID/ADR cylinders. The representative of the United Kingdom explained that although ISO 11513:2011 is not referenced for non-UN cylinders, ISO 9809-1:2010 is referenced and therefore RID/ADR cylinders would be authorized with conformity assessment in accordance with 1.8.7 and 6.2.3.6.

25. The working group also noted that it would be useful to have a reference to "damaged or defective cells and batteries" in the first line of P908 and LP904 but preferred to keep the text as adopted for the UN Model Regulations and inform the United Nations Sub-Committee of Experts that a change may be needed.

***Proposal 4:** In P908 and LP904, amend the text in the first line to read: "This instruction applies to damaged or defective cells and batteries of UN Nos. 3090, 3091, 3480 and 3481."*

Chapter 5.2

26. It was felt that the phrase "marked on the outside of the packaging" in 5.2.1.7.5 and other paragraphs should be replaced by "marked on the outside of the package". The advice of the IAEA should be sought.

Chapter 5.5

27. The secretariat was invited to take account of the changes to 5.5.3 adopted by the Joint Meeting at its spring 2013 session.

Chapter 6.2

28. The Group felt that the word "flammable" should not be deleted from the title of 6.2.6 [[UN 6.2.4](#)] in relation to fuel cells containing liquefied flammable gases. This should be brought to the attention of the United Nations Sub-Committee of Experts.

III. Other business

Informal document: ECE/TRANS/WP.15/AC.1/HAR/2013/3 (France)

29. As requested by the Joint Meeting (ECE/TRANS/WP.15/AC.1/130, paragraph 63) the Ad hoc Working Group considered a proposal prepared by the Government of France on behalf of the informal working group on packaging waste with residues of dangerous goods, that took account of comments made to the representative of France during and after the Joint Meeting session. The proposal was intended to determine appropriate transport conditions under RID/ADR/ADN for the new entry UN No. 3509 PACKAGING, DISCARDED, EMPTY, UNCLEANNED.

30. It was agreed that the text resulting from the discussion should be submitted to the Joint Meeting by the representative of France.

Adoption of the report

31. The Ad hoc Working Group adopted the report on its session by correspondence on the basis of a draft prepared by the secretariat.

Annex II

Additional issues

Chapter 3.3, SP 373

As this provision was applicable in all cases covered in SP373, the Working Group agreed to place “Packing instruction P200 of 4.1.4.1 is not applicable.” before the paragraph reading “The transport document shall include the following statement “Transport in accordance with special provision 373”.”.

Chapter 3.3, SP 371

In SP371 (1) (g), the working group agreed to delete the reference to “single package test” as this did not seem appropriate in that case.

“The design type of the article shall be subjected to ~~a single package~~the following test. A stimulating mechanism shall be used to initiate one article in the middle of the packaging. There shall be no hazardous effects outside the package such as disruption of the package, metal fragments or a receptacle which passes through the packaging.”.

Chapter 4.1, 4.1.6.1.2

The Sub-Committee may wish to note that a new version of ISO 11114-2 was published in 2013.

Chapter 5.2, 5.2.1.5.2

The working group considered that the insertion of “of radioactive material of Class 7” was not appropriate in 5.2.1.5.2 and did not adopt the corresponding amendment to 5.2.1.7.2 in RID/ADR. The Sub-Committee may wish to delete this phrase also in 5.2.1.5.2.

“5.2.1.5.2 The marking of excepted packages ~~of radioactive material of Class 7~~ shall be as required by 5.1.5.4.1.”.
