

## 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

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Item 5(b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:  
new proposals**

### **Alignment of the ADR/RID/ADN Table of Precedence with the Model Regulations**

**Transmitted by the Government of the United Kingdom**

#### **Introduction**

1. In ECE/TRANS/WP.15/AC.1/2013/24, the United Kingdom presents a proposal for the alignment of the table of precedence of hazards in RID/ADR/ADN with that in the Model Regulations, by deleting the column referring to Class 9. Since submitting that paper, the United Kingdom has further discussed the issue with national experts and can now put forward supplementary proposals for consideration.

2. In ECE/TRANS/WP.15/AC.1/2013/24, the United Kingdom stated that the reason for the difference between the table reproduced in RID/ADR/ADN and that in the Model Regulations was not clear. We now believe that this difference arose in relation to the provisions of point 2.1.3.4.2, which appear in RID/ADR/ADN but not in the Model Regulations or other modal provisions.

3. 2.1.3.4.2 refers to solutions and mixtures containing one of six Class 9 substances and sets out the circumstances in which these should or should not be classified under those entries. This is an exception to the general rule: the Class 9 column in the table at 2.1.3.10 demonstrates that all other Classes normally take precedence over Class 9.

4. The United Kingdom's understanding is that 2.1.3.4.2 was included in RID/ADR/ADN because it was argued that PCBs and polyhalogenated biphenyls and terphenyls are harmful and can be a persistent hazard to the environment and wildlife. However, this is not in line with either the UN Model Regulations or air/sea modal regulations. The logic would be to remove this point in the interests of harmonisation and to avoid uncertainty.

5. If this reasoning is correct, the need for 2.1.3.4.1 must also be questioned. Again, this is out of line with the UN Model Regulations and the other modes. The substances to which it refers were all listed in the unstructured ADR/RID in item numbers without a letter (a, b, c), equivalent to packing groups I, II and III respectively, because they were subject to special packing provisions, e.g.:

**‘2801**

**A. Acid substances**

....

6° *Anhydrous hydrofluoric acid* (hydrogen fluoride), aqueous solutions of hydrofluoric acid, containing more than 85 per cent anhydrous hydrofluoric acid.

**Note.** Special packing provisions are applicable to these substances (see marginal 2803).’

In effect, they were effectively treated as ‘super’ packing group I substances but they have since been assimilated into the UN scheme.

## **Proposal**

6. Delete point 2.1.3.4 entirely, and the last two examples in note 2 to the table in 2.1.3.10.

## **Justification**

7. These points, along with the Class 9 column covered in ECE/TRANS/WP.15/AC.1/2013/24, should be removed to align RID/ADR/ADN with the UN Model Regulations and harmonise classification across all categories of dangerous goods and modes of transport.

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