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**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

Ad hoc Working Group on the Harmonization of RID/ADR/ADN  
with the UN Recommendations on the Transport of Dangerous Goods

Geneva, 21-23 April 2015

**Comments on the draft proposal of amendments to  
RID/ADR/ADN, Harmonization with the United Nations  
Model Regulations on the Transport of Dangerous Goods**

Comments submitted by the government of Spain on the draft proposal of amendments to RID/ADR/ADN on the basis of the decisions taken by the UN Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals at its December 2014 session, prepared by the UNECE secretariat.

### 1. Aluminium by products

The present provisions in ADR/RID should be just fine. They were revised simultaneously to the provisions in the orange book.

In table A, BK1 should not be deleted, because in SP244 it is stated that sheeted bulk containers may be used for inland transport. This was already agreed on in the Joint meeting last march, and therefore the provisions were already introduced into ADR/RID 2015. Also, the text to be added into SP 244 was already introduced into CV/CW37:

"CW37/CV37 Before carriage, aluminium smelting by-products or aluminium remelting by-products shall be cooled to ambient temperature prior to loading. Sheeted wagons/vehicles and sheeted containers shall be waterproof. The cargo doors of the closed wagons/vehicles and closed containers shall be marked with the following in letters not less than 25 mm high:

"WARNING  
CLOSED MEANS OF CONTAINMENT  
OPEN WITH CAUTION"

This shall be in a language considered appropriate by the consignor."

I don't specially mind to maintaining this exact wording or taking it over from SP 244, and even taking out he warning (which was asked for by Germany), but I think it is not very reasonable to double the text.

The reference to 4.3.2.2 (7.3.2.4 RID/ADR) is not needed, because in 7.3.2.4 you speak about watertight, and not waterproof as in 4.3.2.2 (where additionally only BK2 and BK3 are permitted)

Therefore, we would propose to:

- not changing anything in table A for UN 3170 (this is to say, not deleting BK1, nor VC1)
- mantaining CV 37 even if SP244 would mean more harmonization,; I think CV 37 has already been tailored for the land modes, and it would be reasonable to maintain it like that.

### 2. Overpack

The main point behind the proposal was to have the same text in all the modes, to make sure the same interpretation is done everywhere... It is true that the RID/ADR text in 5.1.2.1 is the clearest modal text, but even there in the discussion we had on the subject in the joint meeting in September 2014 not everyone interpreted the same. We would ask for introducing the UN text in all three affected paragraphs (3.4.11, 3.5.4.3, 5.1.2.1).

### 3. Repeated placards

The text we proposed to introduce was the same as in RID/ADR 5.3.1.4/5.3.1.4.1. As now the adopted wording is not exactly that, I wonder if it would be convenient to introduce exactly the same text also here; this would be merely and editorial thing, but would enhance the parallelism of the dispositions.

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