
Economic Commission for Europe**Inland Transport Committee**

16 August 2018

Working Party on the Transport of Dangerous Goods**Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)****Thirty-third session**

Geneva, 27–31 August 2018

Item 4 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN: other proposals

Comments on ECE/TRANS/WP.15/AC.2/2018/29**Note by the secretariat**

1. The proposed amendments to the name and description of identification number 9001 in ECE/TRANS/WP.15/AC.2/2018/29 do not appear to be consistent with the use of the terms “heated/[à chaud]” in the context of the definitions of F4 and temperature elevated substances (F2 and M9 and M10).
2. The criteria for F4 substances in 2.2.3.1.2 reads:
“F4 Substances having a flash-point above 60 °C which are carried or handed over for carriage at a temperature within a range of 15 K below the flash-point;”
3. According to 2.2.3.1.2 and 2.2.9.1.13 “elevated temperature substances/[matières transportées à chaud], are those:
 - (a) having a flash-point above 60 °C which are carried or handed over for carriage at or above their flash-point (Class 3, F2);
 - (b) carried or handed over for carriage in the liquid state at or above 100 °C, and in the case of those with a flash-point, substances carried or handed over for carriage in the liquid state below their flash point (Class 9, M9);
 - (c) solids which are carried or handed over for carriage at or above 240 °C; (Class 9, M10).
4. Substances having a flash-point above 60 °C which are carried or handed over for carriage within a range of 15 K below the flash-point are substances of Class 3, F4, identification number 9001 (refer to note 3 to paragraph 2.2.9.1.13).
5. As the mention “heated”/[à chaud]” is related to the concept of elevated temperature substances (i.e. those falling within the criteria in 3 (a) to (c) above), the secretariat believes that the mention to “heated”/ “à chaud” should not be used in the context of F4 substances. It is noted that this mention was not consistently used in the French version of ADN 2017. In addition, the terminology used for the “Name and description” of 9001 in Tables A, B and C should be consistent with the text in other parts of the ADN (i.e: special provisions, criteria in Part 2, etc) and equivalent texts in ADR.
3. The secretariat also believes that the same temperature units should be used in the F4 entry, i.e: either °C or K. If this is agreed, consequential amendments to other paragraphs

would be necessary (e.g. 2.2.9.1.13, remark 24 to column (20) in 3.2.3.1, 3.2.3.3 (flowchart, scheme C, second indent under “heating system on board”, description of Column (17)), 3.2.4.3: A.3 and B, 9.3.2.42.4...). All consequential amendments could be addressed in a separate proposal.

4. In view of the above, the secretariat proposes the following amendments:

Proposal

2.2.3.1.2 Amend F4 to read as follows:

"F4 Substances having a flash-point above 60 °C which are carried or handed over for carriage at a temperature within a range of 15 °C below the flash-point;"

«F4 Matières ayant un point d'éclair supérieur à 60 °C transportées ou remises au transport à une température située dans la plage de 15 °C sous leur point d'éclair;».

2.2.3.3 (F4), entries in Tables A, B and C: Amend to read as follows:

9001	SUBSTANCES WITH A FLASH-POINT ABOVE 60 °C which are carried or handed over for carriage at a TEMPERATURE WITHIN A RANGE OF 15 °C BELOW THEIR FLASH-POINT
9001	MATIÈRES DONT LE POINT D'ÉCLAIR EST SUPÉRIEUR À 60 °C, transportées ou remises au transport à chaud à une température SITUÉE DANS <u>LA</u> PLAGE DE 15 °C SOUS LEUR POINT D'ÉCLAIR

Justification

The proposed amendments will align the name and description of identification number 9001 with the criteria in Part 2 and ADR and would avoid confusion with the criteria for F2 substances (elevated temperature substances).
