
Economic Commission for Europe**Inland Transport Committee**

27 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 3 (c) of the provisional agenda

Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): interpretation of the regulations appended to the ADN

**Chemical industry opinion on Austria's informal document
INF.5****Submitted by CEFIC**

1. Austria's proposal to provide the CAS and/or EC number in the transport documents, in addition to the current requirements, was discussed at length by the chemical industry. Representatives of the German Chemical Association VCI, the Swiss Chemical Association Scienceindustries and the European Chemical Association CEFIC were all involved.
2. It was clear to the aforementioned organisations from the outset of the discussions that the proposal would add no value. The ICE Working Group experts in particular (Intervention in Chemical Transport Emergencies) see the additional provision of the CAS or EC number as raising more questions than the current substance information in the transport documents.
3. The EC number represents a category of European chemicals legislation. It should be borne in mind when calling for this number to be used in the ADN that not all substances (e.g. polymers) are assigned an EU number. Furthermore, not all ADN signatory states are bound by European chemicals legislation. That is why the call to use this number to identify a substance will not achieve the desired result.

The CAS number is an international naming convention for chemical substances. It should be borne in mind here that numerous substances have been assigned multiple CAS numbers. Moreover a CAS number can represent a group of substances posing different hazards. This is why previous efforts to adopt the CAS number as an unambiguous description have failed.

4. Given that the focus is on harmonisation between the various means of transport when updating the dangerous goods regulations, these amendments had to be incorporated into the UN Model Regulations (Orange Book), for road/rail (ADR/RID) and into the IMDG Code. As described in point 1-3, no safety-related improvement is to be anticipated notwithstanding the enormous economic cost .

5. What is more, these efforts are questionable because economic reasons dictate that they can only be implemented at great cost. Generating transport documentation electronically requires an enormous financial outlay. Enhanced templates would have to be created that are out of all proportion to the actual benefit.
6. Based on many years of experience and the aforementioned findings, we request the ADN Safety Committee to accept our explanations and not implement this scheme.
