

INLAND TRANSPORT COMMITTEE

Working Party on the transport of dangerous goods

**Joint Meeting of the RID Safety Committee
and the Working Party on the Transport of
Dangerous Goods**

(Genève, 14-24 September 1999)

RESTRUCTURING OF RID/ADR

DOCUMENT TRANS/WP.15/AC.1/1999/7 : SPECIAL PROVISIONS

Comments by the Government of Belgium

Belgium has the following comments on document TRANS/WP.15/AC.1/1999/7 of the Secretariat, dealing with the special provisions in Chapter 3.3 :

General comments

1. The special provisions dealing with packing problems should be transferred to Chapter 4.1 and become special packing provisions.

Special provisions 26, 247 (partly), 265, 568 to 582, 638, [639], 640

2. Several special provisions are of the same nature and can easily be replaced by one single provision.

Special provisions 38, 59, 62 and 65 can be replaced with : *“This substance is not subject to the requirements of RID/ADR when the minimal content indicated in column (2) is not surpassed”*

Special provisions 48, 60 and 266 can be replaced with : *“The transport of this substance, when it contains more than the maximum content indicated in column (2) is prohibited, except with special authorisation granted by the competent authorities.”*

3. The cross-references for special provisions relating to the same single UN substance identification number are not always present. Belgium is of the opinion that this system would also be very useful for special provisions relating to a limited (2 or 3) number of UN-numbers -

of which one is the same, and to similar dangerous goods with different UN-numbers.

Special provisions 144, 145, 146, 247, 627
188, 230, 287, 636
238, 239, 295, 598
237, 286
63, 190, 229, 277, 592

4. The “Divisions” of the Modal Regulations do not exist in ADR/RID. This wording is to be eliminated.

Special provisions 63, 223, 225, 228

5. Several special provisions are a duplicate of other ones and can be eliminated.

Special provisions with the same content : 132, 246
242, 587
144, 145, 247, 627

6. The special provisions stating “... is a substance of class...” are not adapted to the restructured format of RID/ADR. Their function is to direct the user – who made a classification error - to the correct place in the dangerous goods list. As this table is in numerical order according to the UN-numbers, reference should be made to the correct UN-number and not to the class. (e.g. SP 505 “Magnesium diamide is a substance of Class 4.2” should become “For magnesium diamide, see UN-N° 2004”).

Special provisions 210, 500, 502, 504-524, 526-535, 537, 539-541, 543-552, 554-564, 566-567.

Individual comments

SP

15 Should be added for UN-N° 2852.

26 Eliminate “portable tanks, or”. The word “portable” is too restrictive, and this prescription is superfluous, because already given in column [12] of the dangerous goods list.

28 This is a general prescription, valid for all desensitised explosives without exception. A special provision is not intended for this kind of prescriptions, but for special cases that are only valid for specific substances. SP 28 should therefore be eliminated (the same is valid for the first phrase of SP 227).

If SP 28 is nevertheless retained, it is noted that it is also valid for UN-Nos 1347, 1357, - 3 -

1571, 2555, 2556 and 2907. The text of SP 28 is then to be introduced also in SP 15 and 18, because it is also valid in these cases.

29 This prescription is not applied in RID/ADR at the moment, and should not be introduced now.

63 Eliminate “division of Class 2 and the” in the first sentence and replace “Division 2.1 applies if the content include” with “The contents is considered to be flammable if it includes”.

78 Not intended for “bulk” as meant in RID/ADR (bulk transport of liquids is never allowed). Tank transport is permitted, so there is no problem. To be deleted.

113 This is a general rule, and not only valid for the two UN-Nos indicated. Put it in the text at a fitting place, or complete the list of UN-Nos with all possibilities.

119 At the moment, these machines are not specified in RID/ADR. As a consequence, they are excluded from RID/ADR on the basis of marginal 2009 (b) without quantity limits. This special provision is therefore better not introduced without a separate and well-argued proposal.

179 To be deleted. Is not in agreement with the RID/ADR prescriptions.

190 & 191 These are definitions of sufficient importance to be included in the list of 1.2.1. The last sentence of SP 190 is not part of the definition; see the remark at SP 592.

207 Even without this SP, it will come as no surprise that “polymeric beads and moulding compounds” are made from a polymeric material. Can be deleted.

216, 217, 218 The transport units need not be leakproof when these mixtures are transported in packagings. This prescription must therefore be deleted in these SPs and transferred to the chapter dealing with bulk transport.

217 The last phrase of this special provision is not sufficient. It has to indicate how the mixtures with the Packing Group I liquid have to be classified (under the classification of the Packing Group I liquid ?).

221 After restructuring, the text of this special provision is no longer sufficient. It has to indicate how the medicines of packing group I have to be classified (in the same way as the substances with similar properties that are not medicines).

222 Can be eliminated : the term “water-reactive” is already defined in 1.2.1.

232 The first phrase is also valid for UN-Nos 3082 and 3077. The second phrase is not applicable to RID/ADR.

239 There is a contradiction between the last phrase of this SP and SP 240.

240 To be deleted. UN-N° 3171 is not in RID/ADR.

243 The word “volatility” is not correct. It should be replaced with “flash point”.

273 This SP should also indicate the possible classifications when these substances are not falling under UN 2210.

274 This SP deals with a general rule concerning the particulars in the transport document (the part concerning package markings is wrong !), and should be/is dealt with in that chapter. Moreover, it is incomplete (the chemical name is also allowed). Is best eliminated.

277 Has to be dealt with in the limited quantities section and column, and not in a SP.

281 Is this SP consistent with common practice ? It would make agricultural transports during harvest time impossible.

291 At the moment, this machinery is not specified in RID/ADR. As a consequence, these refrigerating machines or components are not subject to the requirements of RID/ADR without a quantity limit [on the basis of marginal 2009 (b)]. This SP is better not introduced without a separate and well-argued proposal.

292 The second phrase is superfluous. It is already clearly indicated in the dangerous goods list that no subsidiary risk label is needed.

527 Something went wrong with this text. UN-Nos appear at the wrong places.

534 This text is incomplete. According to SP 273 it is not sufficient to stabilize these substances against self-heating; they also have to pass successfully the described test.

585 This exemption seems to be better placed in 1.1.3.1 : Exemptions relating to the nature of the transport operation. There it could be combined very advantageously with the similar case for gases [marginal 2201a (1)]

592 Is less restrictive than SP 190 (with respect to toxic components). The correct version is to be put in SP 190 and SP592 is to be eliminated.

610, 612 To be replaced with SP 113 (if it is retained). A special SP for one single case would be confusing.

619, 620, 626 The content of these special provisions is already given in 2.3.4 and should also be in column (2) of the dangerous goods list (because it gives allowed proper shipping names). It is not necessary to repeat it as a special provision for a third time.

621 To be deleted. Does not fall within the field of application of RID/ADR.
