PROPOSAL FOR SOME CORRECTIONS TO THE RESTRUCTURED ADR

Information paper from the government of France

1. For UN number 1362 CARBON ACTIVATED.

In class 4.2 marg. 2431 NOTE 1 it was said that:

“Carbon made by a steam activation process and non activated carbon of mineral origin are not subject to the provisions of ADR”.

The second part of the note doesn’t seem to be necessary anymore because the name and description mention the fact that only vegetable or animal carbons concerned, but the exemption of carbon coming from a steam activation process has been forgotten.

Proposal:

Add a new special provision against 1362 and in chap. 3.3 as follow:

“xxx carbon made by a steam activation process is not subject to the provisions of ADR.”

2. French translation of the word “tray” in chapter 3.4.6. in the expression “shrink-wrapped trays” or “stretch-wrapped trays”

The word “tray” can be translated in different French words like: “bac, barquette, plateau…”

In the non restructured ADR as well as in the UN model rules and the restructured IMDG code the word “tray” has been translated by the word “bac”.

In the restructured ADR it has been translated by the word “plateau” which is not correct because this item has no edge to hold the inner packagings together.

Proposal:

Align the French text of ADR with the UN model rules and the IMDG code:

In 3.4.6. replace “plateau à housse rétractable” by “bac à housse rétractable”

3. Bulk transport of UN 1405, 1408, 2844, 3170.

In order to align the restructured ADR with RID and the non restructured ADR make the following correction in column 17 of the table in Chap. 3.2.

UN 1405 PG II add VV7
UN 1405 PG III add VV7
UN 1408 PG III add VV1 (remark: subsequently in RID VW7 should be deleted)
UN 2844 PG III add VV7
UN 3170 PG II add VV3
UN 3170 PG III add VV1 (remark: subsequently in RID VW7 should be deleted)
4. Paragraph 2.2.3.1.1. NOTE 7

Delete the word “cosmetics” in the examples for pharmaceutical products not subject to the regulations. The European directive 76/768 defines perfumes as being a part of cosmetics. If this example is kept in the note it could be understood that a part of substances classified under UN 1266 are not subject to the regulations.