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ECONOMIC COMMISSION FOR EUROPE

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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  
(Bern, 28 May – 1 June 2001)

CHAPTER 3.3 – SPECIAL PROVISIONS

DOCUMENTATION

Proposal to delete Special Provision 640 to achieve modal harmonisation

Transmitted by CEPE and CEFIC \*/

**1. Introduction**

The Joint Meeting RID/ADR added in September 2000 a new Special Provision 640 in Chapter 3.3 that reads as follows:

The physical and technical characteristics mentioned in column (2) of Table A of Chapter 3.2, which were intended to establish different conditions of carriage for the same packing group, shall also be mentioned additionally in the consignment note/transport document.

[Nos. 1133, 1139, 1169, 1197, 1210, 1224, 1263, 1266, 1267, 1268, 1286, 1287, 1306, 1308, 1790, 1863, 1866, 1987, 1989, 1993, 1999, 2059, 3269, 3295 and 3336].

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Example:

The necessary description in the transport document for UN1263 assigned to PG III instead of PG II in accordance with the viscosity versus flashpoint provisions of the table in 2.2.3.1.4 would be:

“PAINT (viscous according to 2.2.3.1.4) (vapour pressure at 50°C not more than 110 kPa)”

SP640 was introduced as an alternative to the Item Numbers in the previous editions of ADR/RID.

With the exception of UN1790, Hydrofluoric Acid, such additional subdivision is not included in the UN Recommendations, the IMDG Code and the ICAO technical Instructions.

## **2. Proposal**

The DG description in the transport documents in ADR/RID will not be in harmony with the other modes. Industry is concerned that, after all the work done to harmonize, such an apparently backward step has been taken.

The additional documentary requirements will add nothing to safety for consignments, in particular for packaged goods.

The very lengthy descriptions demanded by SP640 will create problems for consignors when producing documentation. Some computer programs and the documents themselves will not have enough space for such descriptions. The reprogramming costs could be significant.

CEPE and CEFIC propose for these reasons to delete the Special Provision 640.

## **3. Justification**

### **1. Absence of safety benefits**

The only differences in requirements relate to ADR tank codes and the Hazard Identification Numbers identifying flash point category, applicable to loads in tankers or tank containers.

When the goods are transported in tanks, the instructions available in Table A are sufficiently clear to allow the consignee to make the right choice of tank type and HIN.

When the goods are transported in package forms, the transport requirements are the same for the various subdivisions considered in SP640.

### **2. Harmonization with the other modes**

The description of the goods in the transport document will not be in harmony with the other modes.

It does not seem appropriate to take such a backward step after the work done towards harmonization.

### **3. Complexity of transport document**

The increased formal complexity of the transport document will not make the interpretation by the emergency responders easier. It will create problems and additional unnecessary costs to adapt the existing documents' printing programmes.

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