UN/SCETDG/21/INF.7

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS Sub-Committee of Experts on the Transport of Dangerous Goods (Twenty-first session, 1-10 July 2002, agenda item 10))

MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Introduction of the amendments of the 12th edition of the Model Regulations into the RID

Transmitted by the International Union of Railways (UIC/IUR)

During the discussions in the Joint RID/ADR meeting and in the RID Committee of experts meeting on the introduction of the amendments of the 12th edition of the Model Regulations into the RID (and ADR), the representative of the UIC/IUR identified some problems, which could not be solved in those meetings. The UIC/IUR was asked to present the questions directly to the Sub-Committee. Consequently the UIC/IUR asks the Sub-Committee for clarification of the following problems:

1 – Tear gas substances

It is not clear which substances have to be classified under UN 1693 tear gas substances / Matières servant à la production de gaz lacrymogènes. A tear gas mixture may have components with are dangerous or may be not dangerous. In addition we have the footnote to 2.6.2.2.4.3, indicating that 'tear gases are included in PG II even if their toxicity data correspond to PG III values'. Does this mean that the "tear gases" in this footnote are to be considered as the "tear gas substances" according to UN 1693?

What is the meaning of the word "production" in the French proper shipping name of UN 1693? Does this mean that tear gas substances are components of a tear gas? An other category of tear gas substances might be substances for the chemical synthesis of tear gas. On the other hand, some tear gas substances have their own UN-number, like UN 1737 Benzyl bromide or UN 1569 Bromoacetone or UN 1697 Chloroacetophenone.

Perhaps it would be possible to give some clarification in a new Special Provision in chapter 3.3.

2 – Refrigerating machines

It seems strange that the proper shipping name of UN 2857 Refrigerating machines of Division 2.2 is supplemented by a reference to ammonia solutions (UN 2672) of class 8. Would it not be more logical to refer to the ammonia solutions of Division 2.2 (UN 2073)?

3 – Organometallic compounds

In the 12th edition of the Model Regulations a new entry was introduced: UN 3372 Organometallic compounds, solid, water-reactive, flammable, N.O.S. Prior to this, all water reactive organometallic compounds were classified under UN 3207. This entry includes also solutions and dispersions. To have a clear distinction between UN 3372 and UN 3207, it is proposed to add in the proper shipping name of UN 3207 the word "liquid", as follows:

ORGANOMETALLIC COMPOUND, LIQUID or COMPOUND SOLUTION or COMPOUND DISPERSION, WATER-REACTVE, FLAMMABLE, N.O.S.

Solutions or dispersions of substances classified under UN 3372 would then be also substances of UN 3207.

4 - Transport of gases under temperature control

In the 12th edition provisions were included in 3.1.2.6 for the conditions of transport of gases under temperature control. The UIC/IUR has some problems with this new provisions because:

- It is not clear for which gases temperature control is needed.
- In Chapter 5.4 no information for the carrier is provided in the case of the transport of gases under temperature control.
- It is difficult to provide temperature control on a long distance international rail transport involving different railway companies in different states.

5 – Chemical group names

In the 12th edition the expression "Chemical group name" was introduced into 3.1.2.8.1 and 5.4.1.4.3(a) in addition to the expression "Technical name". In 3.1.2.8.1.1 a definition of "Technical name" is given. There is however no definition of "Chemical group name". It cannot be a "Generic name" as defined in 2.0.2.2. Perhaps an example of a "Chemical group name" could give here some information.

6 - Fumigated units

In the 12th edition a new entry UN 3359 was introduced for the transport of fumigated units. The only provision for the transport document of fumigated units is in section 5.5.2: "The date of fumigation and the type and amount of fumigant shall be indicated in the transport document". It is however not clear how the carrier should know that he is transporting a fumigated unit at all. Would it not be more logical to indicate it the transport document also the UN-number, the proper shipping name and the hazard class, as follows:

UN 3359, FUMIGATED UNIT, 9?

7 - "UN-certified"

In the 12th edition for the first time the expression "UN-certified" is used in relation to pressure receptacles (see section 6.2.2). The meaning of the word "certified" is, however, in this context not clear and is even misleading, because the United Nations Organization has no role in the certification procedure according to 6.2.2.5.5. To avoid confusion, the UIC/IUR would prefer another expression instead of "certified" or to give a clear definition of "UN-certified pressure receptacles", e.g. pressure receptacles according to section 6.2.2 of the Model Regulations.