

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, 18-22 March 2002)

MIXED PACKING

Comments on document TRANS/WP.15/AC.1/2001/42

Information paper of Belgium

The two alternative proposals from the United Kingdom concerning mixed packing give rise to the following general remarks¹ :

Proposal 1

1. The mixed packing requirements, as given in table 3.2A and section 4.1.10, are taken from the “unrestructured” RID/ADR still valid until the end of this year. No delegation – not even the UK – questioned in recent years their contents or proposed changes to them. We may therefore safely assume that they do not contain serious mistakes.
2. The current UN text is not less restrictive than ADR and RID, but less precise² ! In those cases where ADR and RID clearly forbid mixed packing, the UN recommendations leave it to the user to come to exactly the same result. The user will have to perform time and time again completely unnecessary studies and his legal responsibilities will increase tremendously.
3. The UK states that the mixed packing provisions now need to be reconsidered because of the introduction of the UN tested packagings. This statement however is contradicted by the UK proposal itself : if the UN tested packagings were to provide a sufficient safety guarantee, it would be perfectly acceptable to have a mixed packing of dangerous goods even if they react dangerously with each other.
4. In every single case, mixed packing is dealt with by means of a specific packaging requirement. Moreover, a dangerous reaction is clearly defined in 1.2.1. Therefore, there is no need for the general requirement in 4.1.1.6.

¹ *The comments (a) to (h) on specific provisions are not dealt with in this paper.*

² *Apart from the maximum quantities mentioned in MP 10 to MP 19, which indeed have to be dealt with when discussing proposal 2.*

Proposal 2

1. The packing instructions are not the appropriate place to introduce the mixed packaging requirements. These instructions would become more complicated for everybody, whilst only a very limited number of packers is interested in the subject (mixed paking is not a very common practice). Moreover, the subject matter is entirely different.
2. The participants in the carriage of dangerous goods are learning now with some difficulty how to use te restructured RID/ADR. Far-reaching and purely “cosmetic” changes (including the elimination of a column in table 3.2A) will not be appreciated very much immediately after the end of the transitional period. Therefore, a transfer to the packing instructions, special provisions or special conditions of packing for the appropriate class is not to be recommended.