

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
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OTHER BUSINESS

Differences between the UN Model Regulations and modal regulations

Note by the secretariat

Reference is made to FIATA document ST/SG/AC.10/C.3/2003/40. Following discussion for these documents by the Sub-Committee, the secretariat believes that some of the issues raised in this document may be easily explained or solved.

Allocation of SP 274 in RID/ADR

Explanation of discrepancy with the UN Model Regulations: The RID/ADR/ADN Joint Meeting decided, as a matter of principle, that the technical name should supplement the name in the case of all N.O.S. and generic entries, for emergency response purposes.

Non allocation of SP 274 in RID/ADR

The RID/ADR Joint Meeting considered that it was not necessary to apply SP 274 to pesticide entries because SP 61 already requires the indication of the pesticide technical name. However the secretariat believes that this decision was not appropriate since SP 61 is not referred to in 3.1.2.8.1 nor 3.1.2.8.1.2, and since pesticide formulations may contain dangerous substances other than the active pesticide substance notably when the active substance is dissolved in a flammable solvent, in which case the other dangerous components should also be mentioned in particular when it is a flammable preparation.

Therefore the secretariat will propose to RID and ADR Contracting Parties to add SP274 for all pesticide entries.

The secretariat notes that SP 61 is also missing in the Orange Book for some pesticide entries and proposes the addition of SP 61 to the following entries:

UN Nos. 2758, 2760, 2762, 2764, 2772, 2776, 2778, 2780, 2782, 2784, 2787, 3021, 3024, 3346.

UN 1010

The name in RID/ADR 2005 has been partly bought in line with UN. However, on a proposal by UIC, the Joint Meeting agreed to keep the present RID/ADR description having a vapor pressure at 70 °C not exceeding 1.1 MPa (11 bar) and a density at 50 °C not lower than 0.525 kg/l.

The problem was brought to the attention of the Sub-Committee by EIGA at the last session (ST/SG/AC.10/C.3/2003/12). However, the conclusions of the Sub-Committee (ST/SG/AC.10/C.3/46, para. 13, comments on para. 13 of the WG report) were not adopted by the RID/ADR Joint Meeting.

UN 1012

Same comments as for UN 1010.

UN Nos. 1060 and UN 1078

The addition of the words "such as mixture P1/P2/F1/F2/F3" corresponds to the denomination of gas mixtures which are currently used in Europe. The secretariat believes that this is not likely to cause any trouble in international multimodal transport since this is mainly for facilitating proper classification of such mixtures and defining the proper transport conditions (filling ratio and test pressure of cylinders/tanks). This has no effect on the information to be included in the transport document, the addition of "Mixture P1" (etc.) is simply authorized as technical name, but not required.

UN 1133 (and all other similar entries listed in ST/SG/AC.10/C.3/2003/40)

The fact that there are more entries in RID/ADR than in the UN Model Regulations is not incompatible with the UN Model Regulations. This does not affect the proper shipping name. For the purpose of user-friendliness, an entry has been included for all possibilities of classification which lead to different transport conditions, taking due account of the UN Model Regulations, e.g. assignment to packing group according to the viscosity (UN para. 2.3.2.2), assignment to IBC instructions according to the vapor pressure (IBC 01, IBC 02 and IBC 03) and assignment to RID/ADR tank instructions according to the vapor pressure. This does not affect at all harmonization.

The only provision which could affect multimodal transport in the sense of the concerns expressed by FIATA is special provision 640 whereby, in certain specific cases, notably carriage in IBCs and in specific RID/ADR tanks or packagings which cannot be used in multimodal transport, additional information has to be entered in the transport document. Nevertheless, this requirement is consistent with the NOTE to 5.4.1.4.2 according to which other elements of information may be required by the competent authority or for certain modes of transport. In RID/ADR, special provision 640 has been developed mainly for the purpose of control when the consignors make use of relaxation provisions.

UN Nos. 1326, and 1358

There is no difference between RID/ADR, the UN Model Regulations and other modal regulations. The difference in the description is covered by RID/ADR special provision 586.

UN 1345

The difference in the description results from a Joint Meeting decision. The secretariat can bring it again to the attention of the RID/ADR Joint Meeting.

UN 1374

Assignment to PG II or III according to fat/moisture contents and anti-oxidant treatment is an IMO decision. Highly sensitive political issue for certain high-producer countries which are not represented in the UN Sub-Committee. Apart from this fact, it should be noted that fish meat is not a chemical product and that it is also carried in large quantities in bulk in containers, vehicles or sea-going vessels. The Class 4.2 properties depend on the fat and moisture contents, and on the anti-oxidant treatment, which are part of the commercial specifications of the product and are therefore easily available while test results on the basis of the Manual of Tests and Criteria are not necessarily available or significant due to the lack of homogeneity of the product.

Different stowage requirements in the IMDG Code according to composition. IMDG Code special provisions 907 and 928 apply. See also Class 9 entry, UN No. 2216.

UN 1381

Presented under two different entries in RID/ADR for the purpose of user-friendliness.
No difference as regards the applicable provisions, therefore no problem.

UN 1389 and all other entries with different proper shipping names LIQUID/SOLID/SOLUTION

The problem has been addressed during the past biennium and all differences should disappear in the 2005 versions of RID/ADR/IMDG/ICAO/IATA.

UN 1471

2005 IMDG Code to be checked.

UN 1591, UN 1598 and UN 1579

a/ortho ?? - to be solved by IMO.

UN Nos. 1661, 1663 and 1673

(o-, m-, p-) to be solved by IMO.

UN 1712

Correction to be made in IMDG Code.

UN 1788

To be solved by ICAO.

UN 1790

Presented differently in RID/ADR for reasons of user-friendliness because different packing instructions apply depending on the concentration, see P 802, PP 79. No inconsistency with UN Model Regulations and no harmonization problem.

UN 1865

To be solved by IMO.

UN 1950

Presented differently in RID/ADR, IMDG, etc. for reasons of user-friendliness. No inconsistency with UN Model Regulations and no harmonization problem.

UN 1965

Same comments as for UN 1060/1078.

UN 2009

To be solved by ICAO.

UN 2014

To be solved by ICAO.

UN 2015

Presented differently in RID/ADR for reasons of user-friendliness due to different RID/ADR tank provisions depending on concentration. No problem for multimodal transport since RID/ADR tanks are restricted to European land transport. Does not affect documentation for packaging or UN tanks.

UN 2031

To be solved by ICAO. Likely to be related to specific air transport conditions such as authorization on passenger/cargo aircrafts.

UN 2037

Same comments as for UN 1950.

UN Nos. 2247, 2364, 2384, 2398, 2482, 2485, 2671, 2740, 2743 and 3056

To be solved by IMO.

UN Nos. 1106, 1107, 1147, 2049, 2050, 2271, 2287, 2288, 2297, 2347, 2458, 2461 and 2615

If several isomers are concerned, should be plural) as in the IMDG Code. However, this is not a major problem, refer to 3.1.2.3.

UN 2426

RID/ADR Joint Meeting decision to restrict range of concentrations. Additional restrictions in RID/ADR special provision 644.

UN 2431

To be solved by IMO.

UN 2809

ICAO decision related to specific risk for air transport.

UN Nos. 2814 and 2900

Entry amended in 2005 versions of RID/ADR.

UN 2857

Harmonization in 2005 versions.

UN 2873

To be solved by IMO, but IMDG Code name seems to be more appropriate if one isomer only.

UN 3054

To be solved by IMO.

UN 3165

To be solved by IMO but does not cause practical problem since M86 is not part of the proper shipping name.

UN 3166

No problem since subject to air transport regulations only.

UN 3175

Decision of RID/ADR Joint Meeting. Does not affect multimodal transport since the description is not part of the proper shipping name and does not bring an inconsistency with the UN Model Regulations.

UN 3256

Upper flashpoint limit is 61 °C in RID, ADR and IMDG Code for all flammable liquids. Discrepancy should disappear in future with GHS harmonization.

UN Nos. 3337, 3338, 3339 and 3340

RID/ADR description corresponds to the exact technical name of R404A, R407A, R407B and R407C. These names are not required in the transport document, therefore no problem.

UN Nos. 3364, 3365, 3366, 3367 and 3368

Mistake in RID/ADR. Should be corrected (wetter should be in capital letters).

UN 3366

ICAO TI should be corrected.

UN Nos. 3364, 3366, 3367, 3368, 3369 and 3370

IATA Regulations should be corrected.

ICAO 8000

Refer to discussion on limited quantities.

UN 2266

Already brought to the attention of the Sub-Committee by IMO. The Sub-Committee did not agree to change the UN name. The secretariat believes that according to IUPAC rules, the UN name is wrong and the IMO name is correct.

UN 2900

See explanations for UN 2814.

UN 3065

Difference probably due to user friendliness. Receptacles with a capacity of not more than 5 litres are not subject to the IATA Regulations.

UN 1386

See also comment for fish meal.

UN 1374

Different stowage conditions depending on composition.
See also IMDG Code special provision 929.
