The UIC and other users of the restructured RID/ADR are of the opinion that the text of the new Special Provision 640, applicable as from 1 January 2003, is very difficult to understand.

The original proposal from France OCTI/RID/GT-III/2001/44 or TRANS/WP.15/AC.1/2001/44 was still understandable. In the September 2001 session, however, on an oral proposal, an additional condition was introduced into the text of SP640:

"Provided that the above mentioned characteristics do not entail different hazard identification numbers in column (20),...".

SP640 is mainly applicable to about 20 generic and n.o.s.-entries for very important products of class 3. In column (20) of table A these products have, according to their flash-point, either hazard identification number 30 or 33.
Because the flash-point is one of the physical and technical characteristics mentioned in column (2) of Table A, determining different conditions of carriage for the same packing group and because the flash-point entails different identification numbers in column (20), the four dispensations at the end of SP 640 seem to be irrelevant and the second part of SP 640, starting with 'Provided that...' could be deleted.

The difference in the conditions of carriage for the substances classified under the same packing group are, from a safety point of view, mainly relevant for the tank code of RID/ADR-tanks:

- L4BN or L1,5BN for PG I
- L1,5BN or LGBF for PG II
- LGBF for PG III, non-viscous
- L4BN, L1,5BN or LGBF for PG III, viscous.

The UIC therefore suggests to add the remark "Special provision 640X" in the transport document only in the case of transport in an RID/ADR tank, as indicated in column (20).

The text of SP 640 could then be simplified as follows:

640  The physical and technical characteristics mentioned in column (2) of Table A of Chapter 3.2 determine different Tank codes for the carriage of substances of the same packing group in RID/ADR-tanks.

In order to identify these physical and technical characteristics of the product carried in the tank, the following shall be added to the particulars required in the transport document / consignment note:

"Special provision 640X" where "X" is the applicable capital letter appearing after the reference to special provision 640 in column (6) of Table A of Chapter 3.2.

These particulars may, however, be dispensed with in the case of carriage in the type of tank which, for substances of a specific packing group of a specific UN number, meets at least the most stringent requirements.