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**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-eighth session, 28 November-7 December 2005  
Item 5 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Fibres, Rags and Textiles of UN 1372, UN 1387, UN 1856, UN 1857 and UN 3360

Transmitted by the expert from Germany

1. The expert from Germany draws the attention of the Sub-Committee to certain discrepancies that he has noted in the Model Regulations concerning these five entries in the Dangerous Goods List. He is aware that discussions have also taken place within the modal bodies on problems with these UN numbers. Papers to resolve individual modal issues have been considered at the RID/ADR/ADN Joint Meeting, see TRANS/WP.15/AC.1/2003/44 from Germany.
2. These UN numbers were introduced into the twelfth revised edition of the Model Regulations in document ST/SG/AC.10/C.3/1999/1 of the IMO by this Sub-Committee during its sixteenth session held from 5-14 July 1999.

When these UN numbers were introduced into the Model Regulations, SP117 was placed against each one. This stated:

“117 Subject to these Regulations only when transported by sea.”

3. The 2003 edition of RID/ADR was the first time when these UN numbers were introduced in the Dangerous Goods List of RID/ADR. Because the SP 117 applies in accordance with the UN Recommendations, RID/ADR states “exempted/NOT SUBJECT TO ADR”.
4. For the sea mode packing instruction, P410 applies to UN 1372, UN 1387 and UN 1857. To UN 1856 and UN 3360, packing instruction P003 together with PP19 applies. Furthermore, SP29 of the IMDG Code applies and in addition SP299 to UN 3360. They state:

“29 The packages, including bales, are exempt from labelling provided that they are marked with the appropriate class (e.g. “class 4.2”). Packages, with the exception of bales, shall also display the Proper Shipping Name and the UN number of the substance that they contain in accordance with 5.2.1. In any case, the packages, including bales, are exempt from class marking provided that they are loaded in a cargo transport unit and that they contain goods to which only one UN number has been assigned. The cargo transport units in which the packages, including bales, are loaded shall display any relevant labels, placards and marks in accordance with 5.3.”

“299 Consignments of:

(i) Cotton, dry having a density not less than 360 kg/m<sup>3</sup>

(ii) Flax, dry having a density not less than 400 kg/m<sup>3</sup>

(iii) Sisal, dry having a density not less than 620 kg/m<sup>3</sup>

according to ISO 8115:1986, are not subject to the provisions of this Code when transported in closed cargo transport units.”

5. That means there are some requirements when such substances are being transported in accordance with the IMDG Code but not in accordance with RID/ADR. If containers which contain these substances are being transported on the road or by railways within a transport chain including maritime transport, they have to be in conformity with the requirements of the IMDG Code. Therefore, they are marked and placarded in accordance with the IMDG Code.

6. Additionally, experience has shown that such substances are liable to ignite spontaneously in air according to oil or moisture content.

In Germany, for example, cloths or rags, depending on their properties, are assigned either to UN No. 3175 SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S, if the flash-point of the solvent used is less than 61 °C, or to UN No. 1325 FLAMMABLE SOLID, ORGANIC, N.O.S., if the cloths or rags have properties of Class 4.1, or to UN No. 3088 SELF-HEATING SOLID, ORGANIC, N.O.S., if the cloths or rags have properties of Class 4.2.

7. Therefore it is the opinion of the expert from Germany that it would be more user friendly if the SP117 could be deleted for these five UN numbers. This would open the possibility to delete the phrase which is used for RID/ADR and would avoid misunderstanding, because users of RID/ADR may consider that it is not necessary to determine the data for classifying such substances for the reason that they are “exempted/NOT SUBJECT TO ADR”.

8. Proposal

To be more user friendly and to avoid any misunderstanding, the expert from Germany proposes the following to open the possibility to enable the same conditions for the transport of these substances in accordance with RID/ADR as it is required in accordance with the IMDG Code:

The SP117 in column (6) shall be deleted for UN 1372, UN 1387, UN 1856, UN 1857 and UN 3360.

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