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Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods

Geneva, 11-15 September 2006
Agenda item 5

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN*

UN Nos. 1372, 1387, 1856, 1857 and 3360

Transmitted by the Government of Germany

SUMMARY

Executive summary: In the context of the harmonization with the twelfth revised edition of the United Nations Model Regulations, the introduction of some UN Nos. into Table A of Chapter 3.2 of RID/ADR affected special provision 117 of the United Nations Model Regulations in Column (6). This special provision stipulates that these UN Nos. are assignable as dangerous goods only when transported by sea. This is why Table A of Chapter 3.2 of RID/ADR only includes the reference “exempted/not subject to ADR” for these UN Nos., which could be misinterpreted. It is also necessary to clarify the conditions of carriage of mixtures of rags, for example, with certain properties of Class 4.1 and other properties of Class 4.2.

* Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2006/28.

Action to be taken:	Deletion of the relevant UN Nos. and insertion of a new special provision.
Related documents:	TRANS/WP.15/AC.1/2003/44-OCTI/RID/GT-III/2003/44 (Germany) TRANS/WP.15/AC.1/96-OCTI/RID/GT-III/2004-A, para. 2 ST/SG/AC/10/C.3/2005/28 (Germany) ST/SG/AC/10/C.3/56, paras. 68 and 69

Introduction

1. At the Joint Meeting of RID/ADR held in Geneva from 13 to 17 September 2004, Germany introduced document TRANS/WP.15/AC.1/2003/44-OCTI/RID/GT-III/2003/44 (see also paragraph 3 of the report TRANS/WP.15/AC.1/96-OCTI/RID/GT-III/2004-A). This document indicated that, in the context of the harmonization with the twelfth revised edition of the United Nations Model Regulations, the following UN Nos. had been introduced into Table A of Chapter 3.2 of RID/ADR:

UN No.	Name and description	Class	Classification Code
	3.1.2	2.2	2.2
(1)	(2)	(3a)	(3b)
1372	Fibres, animal or fibres, vegetable burnt, wet or damp	4.2	S2
1387	Wool waste	4.2	S2
1856	Rags, oily	4.2	S2
1857	Textile waste, wet	4.2	S2
3360	Fibres, vegetable, dry	4.1	F1

2. Special provision 117 of the United Nations Model Regulations applies to these substances in Column (6). This special provision stipulates that these UN Nos. are assignable as dangerous goods only when transported by sea. This is why Table A of Chapter 3.2 of RID/ADR only includes the reference “exempted/not subject to ADR” for these UN Nos.

3. In Germany, 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.

4. Since a named entry now exists (UN No. 1856 RAGS, OILY), the German Government fears that cloths or rags soiled with oil will no longer be considered for their properties but will be carried as substances not subject to RID/ADR in accordance with the entry under that name, which the Government of Germany continues to find disturbing from the technical safety point of view.

5. The Joint Meeting invited the representative of Germany to outline this problem to the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods. Accordingly, it submitted document ST/SG/AC.10/C.3/2005/28 to the Sub-Committee. The Sub-Committee considered that the problems encountered in land transport were not sufficient to warrant amending the United Nations Model Regulations (see the Sub-Committee's report on its twenty-eighth session, paragraph 69), and that land transport bodies should resolve these problems themselves.

6. In addition, doubts remain on how to classify a mixture of fibres of vegetable, animal or synthetic origin (cloths or rags) containing flammable liquids (Class 4.1, UN No. 3175, Packing Group II) and fibres of vegetable, animal or synthetic origin (cloths or rags) that comply with Class 4.2 criteria, and it is not clear to which UN No. these mixtures should be assigned. According to the table of precedence of hazards in subsection 2.1.3.10, such mixtures should always be assigned to Class 4.2. The appropriate UN No. would be 3088 SELF-HEATING SOLID, ORGANIC, N.O.S., Packing Group II.

7. Since such mixtures of cloths or rags are transported frequently and an in situ determination of properties is often impossible, it would be appropriate to attach a special provision to UN No. 3088, which in addition to assigning these substances to the relevant UN No. would contain an assignment provision similar to that already incorporated into RID/ADR in respect of other UN Nos. such as 3175, 3343 and 3344.

Proposals

8. Based on the technical safety concerns referred to above, Germany again proposes the deletion of UN Nos. 1372, 1387, 1856, 1857 and 3360 in Table A of Chapter 3.2 and the cross references to these UN Nos. in Table B.

9. To clarify the classification and assignment to a UN No. of mixtures of fibres of vegetable, animal or synthetic origin (cloths or rags) containing flammable liquids (Class 4.1, UN No. 3175, Packing Group II) and fibres of vegetable, animal or synthetic origin (cloths or rags) that comply with Class 4.2 criteria, the following new special provision should be adopted:

“569 Mixtures of fibres of vegetable, animal or synthetic origin (for example cloths or rags) and fibres of vegetable, animal or synthetic origin (for example cloths or rags) may be carried under this heading without the need for prior application of the classification criteria for Classes 4.1 or 4.2, on condition that no liquid is visible on loading the substance and sealing the packaging, wagon (vehicle) or container.”

This special provision must be applied to UN No. 3088.

Justification

Impact on safety: The substances assigned to these UN Nos. were previously assigned to an appropriate UN No. on the basis of the properties demonstrated. They are now considered dangerous only for transport by sea. The safety level has thus decreased alarmingly. If these UN Nos. are deleted from Table A of Chapter 3.2 and the cross references in Table B are removed, the original safety level will be restored.

Inclusion of the new special provision and assignment to UN No. 3088 will clarify the classification of mixtures of fibres of vegetable, animal or synthetic origin (cloths or rags) containing flammable liquids and fibres of vegetable, animal or synthetic origin (cloths or rags) complying with Class 4.2 criteria.

Feasibility: No problems are envisaged because these UN Nos. have only recently been included in Table A of Chapter 3.2 of RID/ADR.

Applicability: Cloths or rags are transported in bulk, for example for cleaning purposes.
