

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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

Bern, 8-11 September 2009 and  
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Item 6 of the provisional agenda

HARMONIZATION WITH THE UN MODEL REGULATIONS  
ON THE TRANSPORT OF DANGEROUS GOODS

Carriage of dangerous goods packed in limited quantities  
Comments on ECE/TRANS/WP.15/AC.1/2009/28

Transmitted by the European Aerosol Federation (FEA)

**Background**

FEA warmly welcomes the work done jointly by the UN *Committee of Experts in the Transport of Dangerous Goods* and the modal authorities to achieve further harmonization of the requirements for the transport of dangerous goods in limited quantities.

We further welcome the detailed proposals by the Secretariat in ECE/TRANS/WP.15/AC.1/2009/28 for the practical implementation into RID, ADR and ADN.

FEA has two main comments:

1. Today the provisions of other chapters of RID/ADR/ADN are not applicable to the carriage of limited quantities if the conditions indicated in Chapter 3.4 are fulfilled. The proposal of the Secretariat makes the opposite: All RID/ADR/ADN provisions would apply to the carriage of limited quantities except as specifically mentioned. FEA has the opinion that the original spirit should be kept.
2. If the Joint Meeting decides to follow the proposal of the secretariat, other consequential changes might be needed. For the aerosol industry the special provision SP625 *Packages containing these articles shall be clearly marked as follows: "UN 1950 AEROSOLS"* does not fit the new harmonised marking requirements and should then be deleted.

The codes LQ1 and LQ2 in Table A of Chapter 3.2, column (7a) for the entries UN 1950 will be deleted and the maximum quantity per article for carrying dangerous goods as limited quantities will be added.

FEA would like to remind that the limited quantity values for aerosols are mentioned in the special provision SP 277 (*For aerosols or receptacles containing toxic substances the limited quantity value is 120ml. For all other aerosols or receptacles the limited value is 1000ml*) of the 16<sup>th</sup> edition of the UN Model Regulations, and need to be updated accordingly.

Additionally FEA supports the joint A.I.S.E./CEPE proposal for a mandatory implementation of the new diamond marking to be effective for all the surface modes from the 1<sup>st</sup> of January 2012.

### **Proposal**

Amending chapter 3.3 in deleting SP 625.

Amend chapter 3.4.1 proposed by the Secretariat to read as follows:

3.4.1 This Chapter provides the provisions applicable to the transport of dangerous goods of certain classes packed in limited quantities. The applicable quantity limit for the inner packaging or article is specified for each substance in the first line of Column (7a) of Table A of Chapter 3.2. In addition, the quantity “0” has been indicated in this column for each entry not permitted to be transported in accordance with this Chapter. ~~The provisions of Chapter 1.10 [and sections 7.2.4, 7.5.2, 7.5.4, 7.5.11, Chapters 8.1, [8.2], [8.3], 8.4, 8.5, 8.6] do not apply to the carriage of dangerous goods packed in limited quantities. All other p~~Provisions and requirements of RID/ADR/ADN **do not** apply to the carriage of limited quantities except as specifically provided in this Chapter.

Amend chapter 3.4.2 proposed by the Secretariat to read as follows:

3.4.2 Dangerous goods shall be packed only in inner packagings placed in suitable outer packagings. Intermediate packagings may be used. However, the use of inner packagings is not necessary for the transport of articles such as aerosols or “receptacles, small, containing gas”. The packagings ~~[need not conform to the provisions of Chapter 4.1 nor those of Chapter 6.1 except that they]~~ shall **only** meet the provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 and be so designed that they meet the construction requirements of 6.1.4. ~~[Articles containing gases shall meet the requirements of 6.2.5.1 and 6.2.6.1 to 6.2.6.3 as appropriate and relevant.]~~ The total gross mass of the package shall not exceed 30 kg.

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