Assignment of Packing Group I to various UN entries

Transmitted by the Government of the United Kingdom

Introduction

1. The Joint Meeting will recall that the Government of the United Kingdom submitted ECE/TRANS/WP.15/AC.1/2011/14 at the March 2011 session which drew attention to differences between the United Nations Model Regulations and RID/ADR/ADN. The latter assign Packing Group I to UN numbers 1169, 1197, 1266, 1286 and 1287, whereas the Model Regulations does not. The Joint Meeting concluded that although two of the UN entries (UN 1169 and UN 1197) were confirmed by industry as not requiring a Packing Group I assignment, it could be feasible that all five of the UN numbers listed may require this in the future.

2. In order to align with the Model Regulations and create modal harmonisation the Joint Meeting therefore felt that this issue should first be raised at the UN Sub-Committee of Experts on the Transport of Dangerous Goods. The United Kingdom therefore submitted ST/SG/AC.10/C.3/2011/8 outlining the issues involved and seeking the views of the Sub-Committee.

3. The subsequent discussion at the 39th session of the Sub-Committee is covered at paragraph 87 of the official report ST/SG/AC.10/C.3/78 which states the following:

   « 87. The Sub-Committee considered that there was no demonstrated need to provide for packing group I entries for UN Nos 1169, 1197, 1266, 1286 and 1287 since, according to the industry, none of these products met packing group I criteria. »

4. There was therefore no appetite for these entries to be assigned Packing Group I in the UN Model Regulations.

5. The United Kingdom is referring this issue back to the Joint Meeting for a decision on whether these UN numbers should attract Packing Group I entries for RID/ADR/ADN. The United Kingdom is aware from discussion at the previous Joint Meeting that some delegations still believe these entries might be necessary in the future. In addition during the discussion it was recalled that it was decided in principle when RID/ADR/ADN was restructured a number of years ago that these entries should continue to be permitted. Nevertheless the United Kingdom maintains that there should not be differences between the UN Model Regulations and the Modal texts for these UN numbers for the reasons
already given in its previous papers. The United Kingdom therefore repeats its original proposal as set out below.

**Proposal**

6. In Chapter 3.2 Table A, delete the entries for Packing Group I for UN Nos. 1169, 1197, 1266, 1286 and 1287.

**Justification**

7. These amendments would provide for harmonisation of RID/ADR/ADN with the UN Model Regulations for the transport of these substances.