

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**

14 March 2013

Bern, 18–22 March 2013

Item 5(b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
new proposals**

Application of 5.5.3 to the carriage of UN 1845, dry ice

Transmitted by the Government of the United Kingdom

Introduction

1. The new section 5.5.3 of RID/ADR 2013, based on the equivalent text in the 17th revised edition of the UN Model Regulations, sets out special provisions applicable to packages, vehicles and containers containing substances presenting a risk of asphyxiation when used for cooling or conditioning purposes. It has become evident that there are differing interpretations of the text and that its implementation may cause practical difficulties. These concern in particular the carriage of UN 1845, dry ice, previously unregulated by RID/ADR.
2. GEA explained the issues in INF. 17, submitted to the November 2012 meeting of WP.15 and INF.32, submitted to the 42nd session of the UN Sub Committee on the Transport of Dangerous Goods. GEA argues that the risk from dry ice in packages is very small and that the new requirements for placarding might well lead to a disruption in the delivery of essential medical supplies. The UK agrees with this view.
3. The UK believes that it was not the intention during debate in the previous biennium that dry ice in packages should fall under the RID/ADR 5.5.3 marking provisions. We do however accept that as a result of the wording finally adopted for the 2013 editions, it is now generally considered to do so.
4. GEA's arguments for the lifting of the new requirements for dry ice in packages received some support at WP.15, but no final decisions were taken. The UN Sub Committee discussion was similar: difficulties were acknowledged but it was not felt necessary to amend the Model Regulations at that time. The issue is now presented for the consideration of the Joint Meeting.
5. The UK accordingly proposes a textual amendment which would take packaged dry ice outside the scope of RID/ADR/ADN, while continuing to require the new provisions at 5.5.3.5.1 for unpackage dry ice used as a coolant or conditioner. If adopted, this would resolve the industry's difficulties from 2015. A multilateral agreement might be put in place in the interim.

Proposal

- (a) The heading of 5.5.3.3 should be amended to read:

“Marking of packages containing a coolant or conditioner other than dry ice (UN 1845)

- (b) The heading of 5.5.3.4 should be amended to read:

“Marking of packages containing a coolant or conditioner other than dry ice (UN 1845)

- (c) The first line of 5.5.3.6.1 should be amended to read:

“Vehicles and containers containing dangerous goods used for cooling or conditioning, other than packages containing dry ice (UN 1845), shall be marked.....”.

Justification

6. Dry ice in packages is considered to present a low level of risk and has not previously been regulated by RID/ADR either packaged or unpackaged.

7. The 5.5.3 text as it is now most commonly interpreted is disproportionate and has the potential to cause considerable problems for the industry and disruption of vital supplies.
