

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

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Item 5 (b) of the provisional agenda

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

Clarification to Dangerous Goods List (Table A)

Transmitted by the Government of Portugal

Summary

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| Executive summary: | The aim of this proposal is to clarify certain entries of column 15 to the Dangerous Goods List (chapter 3.2) where we cannot find any packing instruction in column 8 but by the contrary we find in column 15 a transport category concerning 1.1.3.6 exemptions related to quantities carried by transport unit, creating to the user some ambiguity. |
| Action to be taken: | Amend this table, in order to remove ambiguity and giving to this kind of substances (with no packaging instructions) the same result i.e. no exemptions according to 1.1.3.6. |

Introduction

Certain entries of column 15 to the Dangerous Goods List (chapter 3.2) have no packing instructions in column 8, which means that the transport in packaging is not allowed. However we find in column 15 a transport category (e.g. 0, 2, 3) concerning 1.1.3.6 exemptions. These exemptions are related to maximum total quantity carried by the transport unit and are applicable only to the transport of packages. This creates to the user some ambiguity, and perhaps is misleading, creating a wrong interpretation. The complete list of dangerous substances affected by this inconsistency is listed (by UN numbers) in the following table [name and description in Portuguese version]:

Nº ONU	Nome e descrição	Classe	Código de classificação	Grupo de embalagem	Etiquetas	Instruções de embalagem	Categoria de transporte (Código de restrição em túneis)
	3.1.2	2.2	2.2	2.1.1.3	5.2.2	4.1.4	1.1.3.6 (8.6)
(1)	(2)	(3a)	(3b)	(4)	(5)	(8)	(15)
1043	ADUBOS EM SOLUÇÃO contendo amoníaco não combinado	2	4A		2.2		(E)
1600	DINITROTOLUENOS FUNDIDOS	6.1	T1	II	6.1		0 (D/E)
2215	ANIDRIDO MALEICO, FUNDIDO	8	C3	III	8		0 (E)
2304	NAFTALENO FUNDIDO	4.1	F2	III	4.1		3 (E)
2312	FENOL FUNDIDO	6.1	T1	II	6.1		0 (D/E)
2426	NITRATO DE AMÓNIO LÍQUIDO, solução quente concentrada a mais de 80% mas no máximo a 93%	5.1	O1		5.1		0 (E)
2447	FÓSFORO BRANCO FUNDIDO	4.2	ST3	I	4.2 +6.1		0 (B/E)
2448	ENXOFRE FUNDIDO	4.1	F3	III	4.1		3 (E)
2576	OXIBROMETO DE FÓSFORO FUNDIDO	8	C1	II	8		2 (E)
3176	SÓLIDO ORGÂNICO INFLAMÁVEL FUNDIDO, N.S.A.	4.1	F2	II	4.1		2 (E)
3176	SÓLIDO ORGÂNICO INFLAMÁVEL FUNDIDO, N.S.A.	4.1	F2	III	4.1		3 (E)
3250	ÁCIDO CLOROACÉTICO FUNDIDO	6.1	TC1	II	6.1 +8		0 (D/E)
3359	EQUIPAMENTO DE TRANSPORTE DE CARGA SOB FUMIGAÇÃO	9	M11				(-)

Notes (columns):

- (1) – UN number
- (2) – Name and description
- (3a) - Class
- (3b) - Classification Code
- (4) - Packing group
- (5) - Labels

(8) - Packing instructions

(15) - Transport Category (Tunnel restriction code)

Proposal 1 (alternative 1)

1. To avoid this ambiguity we propose to delete the transport category in all entries listed above and to introduce a mention made by a hyphen (“-“).

For accomplishing this amendment it would be necessary to change the wording of the following subsections:

- In 1.1.3.6 it would be necessary to add something in these lines: the mention to “-“ means that no exemption is permitted related to maximum total quantity carried by the transport unit.
- In 1.8.5.3 the concept of « loss of product » should be adapted to the new entry (“-“). What quantity would be considered relevant for the purpose of notification of occurrences, it is something that we can discuss.
- Section 3.2.1 should be changed in order to explain that the new mention (“-“) means that no transport category is assigned.

Proposal 2 (alternative 2)

2. To avoid the same ambiguity we can have an alternative solution: to delete the transport categories other than “0” (when assigned), and to extend transport category “0” to these cases, for dangerous goods mentioned in the table above. This would give as result that no exemptions from 1.1.3.6 would be accepted for those entries.

To accomplish this proposal we should make minor adjustments in 1.1.3.6.3 table, concerning the UN numbers 2304, 2448, 2576 and 3176 under transport category “0”.

Justification

This proposal aims to ensure uniform application of the regulations concerning table A of chapter 3.2, giving clear indication in column (15) that for certain substances which cannot be transported in packages [no instructions in column (8)] do not benefit of 1.1.3.6 exemptions.
