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Item 3 (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^{1, 2}

Summary

Executive summary:	The aim of this proposal is to clarify certain entries of column 15 of the Dangerous Goods List (chapter 3.2) where we cannot find any packing instruction in column 8 but on 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 these entries (with no packaging instructions) the same result i.e. no exemptions according to 1.1.3.6.

¹ In accordance with the programme of work of the Inland Transport Committee for 2014–2015 (ECE/TRANS/240, para. 100, ECE/TRANS/2014/23, cluster 9, para.9.2).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2015/36.

Introduction

1. Some entries of 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 carriage of packages. This creates 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:

UN No.	Name and description	Class	Classification code	Packing group	Labels	Packaging	Transport category (Tunnel restriction code)
						Packing instructions	
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	FERTILIZER AMMONIATING SOLUTION with free ammonia	2	4A		2.2		(E)
1600	DINITROTOLUENES, MOLTEN	6.1	T1	II	6.1		0 (D/E)
2215	MALEIC ANHYDRIDE, MOLTEN	8	C3	III	8		0 (E)
2304	NAPHTHALENE, MOLTEN	4.1	F2	III	4.1		3 (E)
2312	PHENOL, MOLTEN	6.1	T1	II	6.1		0 (D/E)
2426	AMMONIUM NITRATE, LIQUID, hot concentrated solution, in a concentration of more than 80% but not more than 93%	5.1	O1		5.1		0 (E)
2447	PHOSPHORUS, WHITE, MOLTEN	4.2	ST3	I	4.2 +6.1		0 (B/E)
2448	SULPHUR, MOLTEN	4.1	F3	III	4.1		3 (E)
2576	PHOSPHORUS OXYBROMIDE, MOLTEN	8	C1	II	8		2 (E)
3176	FLAMMABLE SOLID, ORGANIC, MOLTEN, N.O.S.	4.1	F2	III	4.1		3 (E)
3176	FLAMMABLE SOLID, ORGANIC, MOLTEN, N.O.S.	4.1	F2	III	4.1		3 (E)
3250	CHLOROACETIC ACID, MOLTEN	6.1	TC1	II	6.1 +8		0 (D/E)
3359	FUMIGATED CARGO TRANSPORT UNIT	9	M11				(-)

Proposal 1 (alternative 1)

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

3. 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: “the mention“-”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 (“-“). The quantity to be considered for the purpose of notification of occurrences, should be discussed.

- 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)

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

5. 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

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