

## 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, 14–18 March 2016

Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:  
pending issues**

19 February 2016

### Clarification to Dangerous Goods List (Table A)

#### Transmitted by the Government of Portugal

#### Summary

The aim of this counter-proposal is to clarify and taking in account some questions raised by several Delegates in last Joint Meeting session regarding the content of the proposal described in document ECE/TRANS/WP.15/AC.1/2015/36, giving an alternative solution for the real problem of ambiguity in the use of column 15 of the Dangerous Goods List (chapter 3.2).

#### Introduction

In the initial proposal PT raised the problem that some entries of dangerous goods list (chapter 3.2) have no packing instructions in column 8, which means that the transport in packaging is not allowed, but on other hand, we find in column 15 a transport category (e.g. 0, 2, 3) concerning 1.1.3.6 exemptions (examples of such cases are UN numbers 1600, 2215, 2304, 2312, 2426, 2447, 2448, 2576, 3176 and 3250. By the contrary, UN3359 (fumigated cargo transport unit) and UN3373 (biological substance, category B), have no number allotted as to transport category. The 1.1.3.6 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.

#### Proposal

In line with the proposal of several delegates we find that a practical solution is to change the wording of the explanatory text to column (15) in 3.2.1 making a precision (however, two precisions are needed in our point of view). First precision aligned with the UK proposal as follows:

“Column (15) Transport Category / (tunnel restriction code)

Contains at the top of the cell the transport category to which the substances or article is assigned for the purposes, of exemption related to quantities carried by transport unit (see 1.1.3.6)” and determining the quantities in relation to loss of product (see 1.8.5.3).

Note: references to UN nos. 1600, 2215, 2312, 2426 and 3250 need to be deleted from table in 1.1.3.6.3.

Then we would add a second sentence, in the following lines:

“Where there is no number allotted to the category of transport it is considered that the exemptions of 1.1.3.6 are not applicable.”

The proposed changes are typed in underlined text.

## **Justification**

This proposal aims to ensure uniform application of the regulations concerning table A of chapter 3.2, giving clear indication in explanatory text to column (15) of 3.2.1 as to the correct interpretation of the data presented in column 15 to Table A from chapter 3.2.

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