Further amendment to provision 2.2.51.2.2 for fertilizers

Transmitted by the Government of Sweden

Summary

Executive summary: Further amendments to provision 2.2.51.2.2, thirteenth indent, in order to align it with the United Nations Model Regulations while keeping the current level of safety

Reference document: ECE/TRANS/WP.15/AC.1/2017/35

Introduction

1. In working document 35 (ECE/TRANS/WP.15/AC.1/2017/35) from Sweden, it is explained in detail how to transcribe provision 2.2.51.2.2, thirteenth indent, of the RIDADR//ADN to the newly introduced classification scheme for ammonium nitrate (AN) based fertilizers in the UN Model Regulations. Sweden has however overlooked one detail regarding compound fertilizers of high AN-content, which can easily be adjusted by a small amendment of the proposal in working document 35.

2. In paragraph 7 of working document 35 there is a table showing the by current provision 2.2.51.2.2 affected fertilizer compositions, and which exit boxes they correspond to in the flowchart for AN-based fertilizers in Section 39 of the UN Manual. The first part of entry (b) of this table shows that fertilizer compositions with more than 70% but less than 90% AN and more than 0.4% total combustible materials exceed the values of SP 307 and therefore are not allowed to be transported as Class 5.1 materials (“except under the conditions applicable to Class 1”). It is concluded that this corresponds to fertilizer compositions ending up in exit box 31 in the flow chart.

Problem

3. However, exit box 31 is only a possible exit box for non-compound fertilizers, since by means of box 12 of the flowchart compound fertilizers with less than 90% AN are directed into a branch of their own. For compound fertilizers, the exit box corresponding to exit box
31 is exit box 15, which is where compound fertilizers with more than 70% but less than 90% AN end up if they contain more than 0.4% combustibles. Clearly these compositions are also comprised by current provision 2.2.51.2.2, since they are fertilizer compositions that exceed the value specified for combustible materials in SP307.

Proposal

4. For the above reason it is suggested to transfer exit box 15 from the second to the first indent of the proposed text in paragraph 11 of working document 35. The text would then be amended as follows, where text to be added is in bold underline and text to be removed in bold strike-through:

1. - ammonium nitrate based fertilizers with compositions that lead to exit boxes 4, 6, 8, 15, 31, or 33 of the flowchart of paragraph 39.5.1 of the Manual of Tests and Criteria, Part III, Section 39, unless they have been assigned a suitable UN number in Class 1;
   - ammonium nitrate based fertilizers with compositions that lead to exit boxes 15, 20, 23 or 39 of the flowchart of paragraph 39.5.1 of the Manual of Tests and Criteria, Part III, Section 39, unless they have been assigned a suitable UN number in Class 1 or, provided that the suitability for carriage has been demonstrated and that this has been approved by the competent authority, in Class 5.1 other than UN No. 2067;

5. The corresponding amendment to the alternative proposal in paragraph 12 of working document 35 would be:

   - ammonium nitrate based fertilizers with compositions that lead to exit boxes 4, 6, 8, 15, 31 or 33 or, for mixtures of ammonium nitrate with more than 5% ammonium sulphate, exit box 39 of the flowchart of paragraph 39.5.1 of the Manual of Tests and Criteria, Part III, Section 39, unless they have been assigned a suitable UN number in Class 1;
   - ammonium nitrate based fertilizers with compositions that lead to exit boxes 15, 20, 23 or, except for mixtures of ammonium nitrate with more than 5% ammonium sulphate, exit box 39 of the flowchart of paragraph 39.5.1 of the Manual of Tests and Criteria, Part III, Section 39, unless they have been assigned a suitable UN number in Class 1 or, provided that the suitability for carriage has been demonstrated and that this has been approved by the competent authority, in Class 5.1 other than UN No. 2067;