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
Geneva, 17–21 September 2018

Item 5 (b) of the provisional agenda
Proposals for amendments to RID/ADR/ADN:
new proposals

RID/ADR 7.5.2.1 – mixed loading prohibitions for packages
for which no danger labels are prescribed

Transmitted by the Government of Germany *·**,

Introduction

1. In Germany, the question has arisen in connection with the mixed loading prohibitions
of RID/ADR 7.5.2 as to how to deal with packages that contain dangerous goods for which
no danger labels are prescribed in Table A of Chapter 3.2 (UN 2211 and UN 3314).

2. Germany is of the view that there are no safety concerns with regard to the mixed
loading of UN 2211 and UN 3314 with goods of classes 2 to 9. However, mixed loading with
substances and articles of Class 1 should be prohibited, because when UN 2211 and UN 3314
are being carried, there is a risk of an explosive atmosphere developing. In addition,
according to the table in RID/ADR 7.5.2.1, mixed loading with substances and articles of
Class 1 is only possible to a very limited extent.

Proposal

3. Insert the following as a second sentence in RID/ADR 7.5.2.1:

* In accordance with the programme of work of the Inland Transport Committee for 2018-2019,
(ECE/TRANS/2018/21/Add.1, Cluster 9, (9.2)).
** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF)
under the symbol OTIF/RID/RC/2018/15.
“For packages containing dangerous goods for which no danger label is prescribed in Table A of Chapter 3.2, mixed loading with substances and articles of Class 1 shall be prohibited.”

4. Consequential amendment to RID 7.5.2.1:

The current second sentence becomes the third sentence.

**Justification**

5. There is no clear statement in RID/ADR 7.5.2.1 concerning mixed loading for packages containing dangerous goods for which no danger label is prescribed in Table A of Chapter 3.2. For safety reasons, there should be such a mixed loading prohibition for substance and articles of Class 1. At present, this only concerns UN Nos. 2211 and 3314 in Table A.