

## 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

14 March 2019

Bern, 18-22 March 2019

Item 5 (a) of the provisional agenda

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

### **Comment on document ECE/TRANS/WP.15/AC.1/2019/16**

**Transmitted by the Government of France**

#### **Introduction**

1. We agree with the necessity to harmonize with the name of the Model Regulation as proposed in point 1 of the document ECE/TRANS/WP.15/AC.1/2019/16.
2. In paragraph 13 it is said there are no mixture of BUTADIENE with less than 40% is transported actually.
3. However after further checking it has been brought to our attention that Butane (UN 1011) and LPG (UN 1965) may contain traces of Butadiene, respectively 0,1 to 0,3% and around 1%
4. So far these substances didn't correspond to any of the descriptions for Butadiene mixtures (neither the one contained in the model rules nor the current one in RID/ADR). Therefore they didn't require any consideration for stabilization.
5. The way the special provision in proposal 2 is drafted doesn't mention any threshold for Butadiene concentration in the mixture. Therefore, it could be understood in such a way that the two substances mentioned above would now require stabilization or a specific study for stabilization
6. If it is deemed necessary to add such a special provision To clarify this point, we would like to add some amendments to it as shown in the following proposal :

#### **Proposal**

Modify SP XXX as follows (new text underlined) :

“SP XXX For butadienes or butadienes and hydrocarbon mixtures not fulfilling the minimal content of butadiene to be assigned to this entry, considered chemically unstable, the need of stabilization during transport has to be analysed according to 2.2.2.2.1

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