



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, 17–27 September 2019

Item 4 of the provisional agenda

**Harmonization with the United Nations Recommendations
on the Transport of Dangerous Goods****Report of the Ad Hoc Working Group on the Harmonization
of RID/ADR/ADN with the United Nations
Recommendations on the Transport of Dangerous Goods**

Note by the secretariat*, **

I. General

1. The Ad Hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods met in Geneva on 24 and 25 April 2019 under the chairmanship of Mr. C. Pfauvadel (France).
2. Representatives of Belgium, France, Germany, Luxembourg, Netherlands, Spain, Sweden, Switzerland, United Kingdom, the Central Commission for the Navigation of the Rhine (CCNR), the Intergovernmental Organisation for International Carriage by Rail (OTIF) and the International Road Union (IRU) participated in the session.
3. The session was held in English, without interpretation. The documentation prepared by the secretariat, including the agenda, was issued as informal documents which were made available on the website of the UNECE Sustainable Transport Division as follows:

ECE/TRANS/WP.15/AC.1/HAR/9

Provisional agenda for the ninth session
(Secretariat)

ECE/TRANS/WP.15/AC.1/HAR/2019/1

Harmonization with the United Nations
Model Regulations on the Transport of
Dangerous Goods (Secretariat)

* In accordance with the programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/WP.15/237, annex V, (9.2)).

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2019/22.

4. The background documents were the report of the United Nations Economic and Social Council's Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals and annexes thereto, circulated by the secretariat as documents ST/SG/AC.10/46 and Add.1-3.

5. The Ad Hoc Working Group adopted the provisional agenda prepared by the secretariat.

II. Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations

6. The ad hoc Working Group (hereafter referred to as the "Working Group") examined the draft amendments in document ECE/TRANS/WP.15/AC.1/HAR/2019/1. The amendments proposed by the Ad hoc Working Group are reproduced in the addendum to this report (ECE/TRANS/WP.15/AC.1/2019/22/Add.1). Some texts were placed between square brackets pending a decision by the Joint Meeting or feedback from other intergovernmental bodies.

7. The Working Group agreed that the comments below, providing the rationale behind some of the recommendations made by the working group, should be brought to the attention of the Joint Meeting, the Working Party on the Transport of Dangerous Goods, the ADN Safety Committee or the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee), as appropriate.

A. Exemptions related to the carriage of electric energy storage and production systems (amendments to 1.1.3.7)

8. The Working Group examined the two proposed alternatives and noting that the exemption in 1.1.3.7 as proposed in alternative 1 in document ECE/TRANS/WP.15/AC.1/HAR/2019/1 was an exemption to the general rule currently in sub-paragraph (b) of RID/ADR/ADN, concluded that sub-paragraph (b) should be amended accordingly, instead of adding a new sub-paragraph (c).

9. A consequential amendment to the heading of the new section in 5.5.4 was also proposed (see paragraph 59).

B. Amendments to the definitions in Chapter 1.2

1. Definition of "dose rate": consequential amendments

10. A member of the secretariat informed the Working Group that additional consequential amendments related to the replacement of "radiation level" by "dose rate" had been identified during the preparation of the twenty-first edition of the Model Regulations. The Working Group agreed that these consequential amendments also applied to RID/ADR/ADN.

2. Definition of "Self-accelerating decomposition temperature"

11. The Working Group took note of the comment from the secretariat in document ECE/TRANS/WP.15/AC.1/HAR/2019/1 but concluded that since section 28 of the Manual of Tests and Criteria mainly contained provisions for determining the self-accelerating decomposition temperature, the information regarding the effects of heating under confinement was not necessary.

3. Definition of "transport unit"

12. The representative of CCNR considered that the definition of "transport unit" in ADR could be further harmonized and invited the Joint Meeting to consider it.

C. Chapter 1.6

13. The Working Group agreed that the proposed new 1.6.6.3 should be introduced in RID/ADR/ADN as a new paragraph 1.6.6.2.3.

D. Reference to “except for animal material” in table 1.10.3.1.2

14. The representative of Germany indicated that while “animal material” used to be carried in cultures and therefore classified by default as infectious substance of category A, this was no longer the case. She pointed out that nowadays most “animal material” fulfilled the criteria for classification as category B.

15. It was also noted that animal material of Category A is currently not exempted as a high consequence dangerous goods in Chapter 1.4, table 1.4.1 of the Model Regulations. The Working Group considered that this inconsistency between the Model Regulations and the RID/ADR/ADN should be brought to the attention of the TDG Sub-Committee and invited the TDG Sub-Committee to consider how to address it (e.g.: either by including animal material of Category A in the list of high consequence dangerous goods for all modes or by deleting it).

16. The Working Group decided to keep the text between square brackets pending the feedback from the TDG Sub-Committee on this matter.

E. Assignment of fireworks to UN No. 0431

17. The Working Group considered that the text could be further clarified and suggested some editorial amendments that were placed between square brackets, on the understanding that they would be forwarded to the TDG Sub-Committee for consideration.

F. Concentration and packing method for “DI-(4-tert-BUTYLCYCLOHEXYL) PEROXYDICARBONATE” in 2.2.52.4

18. The Working Group confirmed that given that carriage of temperature-controlled substances by rail was not allowed, the replacement of “OP7” by “OP8” was not relevant for RID.

G. Medical or clinical waste (2.2.62.1.11.1)

19. Noting that the text in lower case characters was not part of the proper shipping name, the Working Group agreed that the mention “proper shipping name” should be replaced by “name” at the beginning of the new note 1 under 2.2.62.1.11.1. It was noted that the same amendment applied to note 1 in 2.2.62.1.4.1 and the note in 2.2.62.1.4.2.

20. Since these modifications were also relevant for the Model Regulations, it was agreed to bring them to the attention of the TDG Sub-Committee.

H. Name and description of UN No. 3359 in 2.2.9.3

21. The Working Group noted that the name of UN No. 3359 in the list of M11 entries in 2.2.9.3 was not aligned with the name in Table A. The correction will be included in a corrigendum to ADR.

I. New entries for Table A

22. The Working Group agreed on the following modifications and interpretations:

1. Amendments to Table A of ADN

23. The proposed amendments to Table A of ADN will be submitted for consideration to the ADN Safety Committee, that may consider entrusting its discussion to the informal working group on substances.

2. UN No. 0511

24. The Working Group agreed that “(+13)” should be added in column (5), for rail carriage only.

3. UN No. 0513

25. The Working Group confirmed that only code W2 was necessary in column (16) for rail transport, since the entry only applied to 1.4S explosives.

4. UN No. 3549 (MEDICAL WASTE CATEGORY A, AFFECTING HUMANS, solid or MEDICAL WASTE CATEGORY A, AFFECTING ANIMALS only, solid)

26. The Working Group confirmed the appropriateness of the codes in columns (16) and (19) and agreed to delete the square brackets around them.

27. The Working Group considered that the transport category and tunnel code currently assigned to Category A infectious substances i.e. “0 (–)” should be added in column (15) for UN No. 3549. The code was placed between square brackets, pending confirmation by the Working Party on the Transport of Dangerous Goods (WP.15).

28. As regards code CV26/CW26, it was pointed out that the prohibition to use vehicles/wagons or containers with load compartments made of or containing materials that cannot be easily cleaned (e.g.: wood) was often addressed by national legislation. In some cases, use of such materials was permitted when they were protected by plastic or other materials easy to clean. It was suggested that a special provision containing more detailed requirements than those currently prescribed by CV26/CW26 should be developed. In the meantime, the Working Group decided to keep CV26/CW26 in column (18) for wastes carried under UN No. 3549.

29. For the applicable provisions in columns (6) and (9b) see paragraphs 30 to 33 below.

5. UN No. 3549 in refrigerated liquid nitrogen

30. Views were divided on the need for a specific entry for wastes of UN No. 3549 in refrigerated liquid nitrogen like that applicable to other infectious substances (UN Nos. 2814, 2900 and 3291).

31. Some delegations considered that cooling was appropriate in the case of liquid wastes to avoid spillage or to prevent proliferation of bacteria but were not convinced that this was necessary in the case of solid wastes. Others pointed out that MP6 already allowed the use of a coolant and therefore felt that an additional entry to this end was not necessary. It was noted however, that even though MP6 was assigned to UN Nos. 2814, 2900 and 3291, an additional entry addressing carriage in refrigerated liquid nitrogen was available. Some others felt that if assignment of MP6 to the first entry was intended to allow coolants or conditioners other than refrigerated liquid nitrogen, prohibition to use the latter should be clearly indicated, and suggested to address it in a special provision.

32. After an exchange of views, the Working Group agreed on the following two options:

Option 1:

Keep only one entry, with MP6 assigned in column (9b), and a new special provision 6XX (“Refrigerated liquid nitrogen shall not be used as a coolant for substances under this entry.”)

Option 2:

Keep two entries, as for UN Nos. 2814, 2900 and 3291, with MP6 and the new special provision 6XX assigned to the first entry, and MP2 only for the entry addressing carriage in refrigerated liquid nitrogen.

33. The Working Group invites the Joint Meeting to take a decision on the most appropriate option and to consider whether a similar approach should be followed for UN Nos. 2814, 2900 and 3291.

6. UN No. 3529

34. Noting that land transport of engines and machinery of UN No. 3529 was already subject to a specific regime, the Working Group concluded that assignment of special provision 356 was not necessary.

J. Technical name for UN Nos. 3077 and 3082 in 3.1.2.8.1.4

35. The Working Group felt that the wording of 3.1.2.8.1.4 could be further improved and proposed some editorial changes that would have to be submitted to the TDG Sub-Committee for consideration. In the meantime, the proposed amendments were placed between square brackets.

K. Chapter 3.3**1. Special provisions 360 and 388**

36. The Working Group decided to place the proper shipping name of UN No. 3536 in special provisions 360 and 388 between square brackets, pending the decision of the TDG Sub-Committee on document ST/SG/AC.10/C.3/2019/8.

2. Special provision 390 (a)

37. Since marking of the proper shipping name on packages is not required for RID/ADR/ADN, the text “Lithium metal batteries packed with equipment” and “Lithium ion batteries packed with equipment” was deleted.

3. Special provisions 393 and 394

38. The Working Group agreed that adoption of these special provisions needed further consideration.

39. It was noted that new provisions for stability testing of nitrocellulose mixtures had been developed and adopted by the TDG Sub-Committee for inclusion in the seventh revised edition of the Manual of Tests and Criteria. The Working Group considered that as a consequential amendment, current 2.3.2.9 should be deleted, as the test therein had been replaced by the Bergmann-Junk and methyl violet paper tests now included in the Manual of Tests and Criteria. In this context, it was also pointed out that the whole text of section 2.3.2 needed to be revised (e.g: to remove references to 2.3.2.9; to simplify or even delete the text of current 2.3.2.3 and 2.3.2.4; and to further clarify that the ignition temperature test shall always be performed before the stability tests referred to in special provisions 393 and 394). It was also noted that it would be appropriate to check the applicability of section 2.3.2 to other entries in addition to those against which special provisions 393 and 394 were assigned.

40. The representative of Germany volunteered to submit a proposal for the Autumn session of the Joint Meeting. In the meantime, the proposed text for special provisions 393 and 394 was placed between square brackets.

L. Chapter 4.1

1. Note under the heading of Chapter 4.1

41. The Working Group noted an inconsistency in the French version of the current text of the note. The paragraphs referenced in this Note were not the correct ones. It appeared that there was an error in the transcription of the text adopted by the Joint meeting at its March 2016 session (ECE/TRANS/WP.15/142/Add.2, annex IV) and that the French text should be aligned on the English text. The secretariat was requested to address it in a corrigendum.

2. Packing instruction P200 (11)

42. The Working Group noted that the amendments to P200 (4) in the Model Regulations applied to P200 (11) in RID/ADR and that reference is already made to the 2016 edition of standard EN ISO 24431. The Working Group proposed to replace EN ISO 24431:2016 by ISO 24431:2016 in P200 (11) as well as an explanatory note addressing the possibility of using the EN version instead of the ISO version of the standard.

3. Packing instruction P622

43. The Working Group proposed an editorial correction to additional requirement 1 and agreed that it should be brought to the attention of the TDG Sub-Committee.

4. Packing instruction P801

44. Noting that P801a applied to used batteries of UN No. 2800, the Working Group considered that it would be preferable to merge the packing provisions for all used batteries in one unique packing instruction. On these grounds, it agreed to delete current P801a in 4.1.4.1 and adopted the proposed P801 with some additional amendments (e.g.: addition of a reference to used batteries of UN No.2800 in the first line under the heading and a new subparagraph (g) under paragraph (2), with the same text as the one currently in paragraph (5) in P801a). The Working Group also adopted the consequential amendments to column (8) of Table A for UN Nos. 2794, 2795, 2800 and 3028, and to special packing provision PP16 in P003.

45. In addition, the Working Group adopted some editorial corrections to (2) (a) and (c) that were placed between square brackets, on the understanding that they would be brought to the attention of the TDG Sub-Committee.

5. Packing instruction P903, paragraph (5)

46. The Working Group noted that the requirement for the active devices described in paragraph (5) to avoid interferences with aircraft systems was only necessary when land carriage was followed by air transport. On these grounds it decided to place that sentence in a note. Noting that the same sentence also appeared in paragraph (4) in the UN Model Regulations, the Working Group agreed to insert the same note under that paragraph in RID/ADR as well.

6. Large packing instruction LP622

47. Some delegations pointed out that waste of UN No. 3549 was often incinerated and expressed concerns about the availability of incineration plants for large packagings. The representative of the United Kingdom confirmed that LP622 had been introduced in the Model Regulations to address carriage for disposal in general, not for incineration.

48. It was also noted that in some cases, national transport legislation explicitly prohibited taking out the inner packagings from the intermediate and outer packagings, when carried for incineration. Referring to the definition of carriage, the chairman considered that this

prohibition was difficult to understand within the framework of transport regulations since incineration always happened after carriage and therefore could not be considered part of the transport operation.

49. A question was also raised on whether outer packagings of large packagings used for the carriage of these wastes could be reused as well as on the need to include requirements for decontamination before reuse.

50. The representative of Germany said that she might consider submitting a document containing information on existing practices at national level for the treatment of these wastes (e.g. mandatory incineration, decontamination provisions for outer packagings, etc.).

51. In the meantime, the Working Group decided to adopt LP622 as proposed.

7. Reference to ISO standards in 4.1.6.15

52. The Working Group considered that the proposed amendment to replace the reference to EN 17879:2017 by a reference to Annex A of ISO 17879:2017 should be confirmed by the Working Group on Standards of the Joint Meeting, at its autumn 2019 session. The Working Group on Standards should also check whether it would be appropriate to refer to the different versions of ISO 10297 instead of the EN version of this standard.

53. The amendments were placed between square brackets pending confirmation by the Working Group on Standards of the Joint Meeting.

8. Reference to “shipment” of radioactive material in 4.1.9.2.4 (e)

54. A member of the secretariat noted that the term “shipment” (in French “expédition”) was specifically defined in the IAEA Regulations (and in the Model Regulations), when used in the context of carriage of radioactive material and suggested that the same definition be introduced in RID/ADR/ADN. Some delegations felt that the definition in the IAEA regulations was covered already by the general term “consignment” used in RID/ADR/ADN. Others expressed concerns about the term to be used in other languages (e.g. German) where “shipment” and “carriage” were currently being used interchangeably. It was also noted that this question had already been considered at the spring 2013 session of the Joint Meeting¹.

55. The Working Group invites the Joint Meeting to consider introducing a definition of “shipment” for the carriage of radioactive material.

M. Chapters 5.1, 5.3, 5.4 and 5.5

1. Reference to “conveyance” in 5.1.5.3.2

56. Noting that the term “conveyance” was applicable to all modes, the Working Group considered that it should be kept, and that therefore, the proposed text would be applicable to all land modes. Consequently, the proposed amendment addressing carriage by inland waterways was deleted.

2. Total quantity of dangerous goods (5.4.1.1.1 (f))

57. The Working Group proposed an editorial amendment to the French text and agreed that it should be brought to the attention of the TDG Sub-Committee.

3. Additional provisions for Class 2 (5.4.1.2.2 (d))

58. The Working Group considered that the proposed amendment was only suitable for ADR and proposed equivalent amendments for RID and ADN. It was agreed that the amendment relevant to ADN should be submitted to the ADN Safety Committee for consideration.

¹ See ECE/TRANS/WP.15/AC.1/130 (paragraph 36) and informal documents INF.13 and INF.14 submitted at the 2013 spring session of the Joint Meeting.

4. Dangerous goods in equipment in use or intended for use during carriage (5.5.4)

59. The Working Group agreed that the heading of the new section 5.5.4 should be fully aligned with the description of dangerous goods contained in equipment in 1.1.3.7 (b), as amended.

5. Orange-coloured plate marking provisions for radioactive material carried under exclusive use (ADR 5.3.2.1.4)

60. The Working Group questioned whether the text of 5.3.2.1.4 of ADR corresponded to 7.2.3.1.1 of the Model Regulations and wished to have the opinion of the Joint Meeting on this matter. The amendment intended to align ADR 5.3.2.1.4 with 7.2.3.1.1 of the Model Regulations was placed in square brackets.

N. Chapters 6.1, 6.2, 6.5 and 6.6

1. Reference to “UN design type mark” in 6.1.3.1 (e) and use of “must” in 6.1.3.14, 6.5.2.1.3 and 6.6.3.3

61. The Working Group considered that the term “type approval mark” should be used in 6.1.3.1 (e) instead of “UN design type mark” and that “must” should be replaced by “shall” in the English version of 6.1.3.14, 6.5.2.1.3 and 6.6.3.3. It was agreed that these changes should be brought to the attention of the TDG Sub-Committee.

2. Marking provisions for UN pressure receptacles in 6.2.2.7.2 (c)

62. The Working Group confirmed that “authorized” was the appropriate term to be used, in accordance with the rationale given in document ST/SG/AC.10/C.3/2018/22 and the decision taken by the TDG Sub-Committee at its fifty-third session (see ST/SG/AC.10/C.3/106 para.88).

3. New text in 6.7.2.19.6, 6.7.3.15.6 and 6.7.4.14.6

63. The Working Group decided to renumber current 6.7.2.19.6, 6.7.3.15.6 and 6.7.4.14.6 as 6.7.2.19.6.1, 6.7.3.15.6.1 and 6.7.4.14.6.1 and to transfer the proposed new text to the new paragraphs 6.7.2.19.6.2, 6.7.3.15.6.2 and 6.7.4.14.6.2 for better reference.

64. It was agreed that this should be brought to the attention of the TDG Sub-Committee.

O. Amendments to ADN (Chapter 7.1)

65. The Working Group agreed to forward the proposed amendments to Chapter 7.1 of ADN to the ADN Safety Committee for consideration.

III. Adoption of the report

66. The Working Group adopted the report on its session by correspondence, based on a draft prepared by the secretariat.
