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**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods  
(Bern, 7-11 March 2005)

**NEW PROPOSALS OF AMENDMENTS TO RID/ADR/ADN**

**Special Provision 640**

**Transmitted by the Government of Belgium \*/**

**SUMMARY**

***Executive summary:***

Until 31.12.2004, special provision 640 always applied when different transport conditions were possible for substances with the same UN-number, proper shipping name, packing group and labels. This is no longer the case. Moreover, this special provision is very difficult to understand due to the complexity of the exceptions it contains.

***Action to be taken :***

Make special provision 640 applicable to all kinds of transport of the dangerous substances concerned, except perhaps in portable tanks. If this proposal is not accepted, eliminate special provision 640 altogether.

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\*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2004/29.

## 1. Introduction

- 1.1. Special provision 640 was introduced to deal with the very few dangerous substances that can have different transport conditions for the same UN-number, proper shipping name, packing group and labels. It identified the correct row in the Dangerous Goods List in all cases where more than one row corresponded to the data given in the transport document.
- 1.2. With the changes introduced to special provision 640 on the 1<sup>st</sup> of January 2005, this is no longer the case (for example : UN 1993, packing group II is allowed in IBCs when its vapour pressure is  $\leq 110$  kPa, but not when that pressure lies between 110 and 175 kPa ; nevertheless, “Special provision 640X” need not be indicated in the transport document).
- 1.3. At the training sessions for drivers and safety advisors, it has become clear that this special provision is very difficult to understand due to the complexity of the exceptions it contains. The last paragraph in particular creates much confusion (“*These particulars may, however, be dispensed with in the case of carriage in the type of tank which, for substances of a specific packing group of a specific UN number, meets at least the most stringent requirements*”).
- 1.4. There are very few substances to which special provision 640 applies, and living up to this provision requires very little effort and expense (a small change to the printing instructions of the computer program will do in most cases). From the Belgian point of view, these small disadvantages do not justify the confusion and errors that result from the introduction of all possible exceptions in the text of the provision. Only for the carriage in portable tanks – with its high frequency of multimodal transports – an exception could possibly be envisaged.

## 2. Proposal

- 2.1. Change special provision 640 as follows :

“640 The physical and technical characteristics mentioned in column (2) of Table A of Chapter 3.2 determine different conditions of carriage for the same packing group.

In order to identify these conditions of carriage, the following shall be added to the particulars required in the transport document :

“Special provision 640X” where “X” is the capital letter appearing after the reference to special provision 640 in column (6) of table A of Chapter 3.2.

[Provided that the above mentioned characteristics do not entail different hazard identification numbers in column (20), these particulars may, however, be dispensed with in the case of carriage in portable tanks.]”

- 2.2. If proposal 2.1 is not accepted, it is proposed to eliminate special provision 640 altogether.