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**ECONOMIC COMMISSION FOR EUROPE  
INLAND TRANSPORT COMMITTEE**

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods

**Comments on -/AC.1/2006/24**

Document: ECE/TRANS/WP.15/AC.1/2006/24 (CEFIC) contains a number of statements which, from the secretariat standpoint, are not completely correct.

Para 3 suggests that the GHS criteria would be included in RID and ADR in 2009. No decision has yet been taken by the Joint Meeting in this respect.

Para 4 suggests that only substances identified in the IMDG Code as marine pollutants may be classified under UN 3077 or UN3082.

In fact, special provision 909 applicable to these two UN numbers in the IMDG Code specify clearly that UN Nos 3077 and UN3082 may be used for substances which do not meet the IMO criteria for marine pollutants but which are subject to other transport regulations due to their potential to cause harm to the environment other than the marine environment (see annex overleaf).

Therefore, all substances required to be classified as UN 3077 or UN3082 by RID/ADR may also be classified as UN3077 or UN3082 for maritime transport under the conditions of the IMDG Code, and there is no problem to be expected for outbound traffic in ports as described in paragraph 9 of the CEFIC document.

Similarly, for air transport, special provisions A97 specifies that “Substances classified as UN3077 or UN3082 by the regulations of other modes of transport may also be transported by air under these entries (see annex overleaf). Therefore there is no conflict with the ICAO TI for outbound transport.

For inbound transport, the same provisions apply, and therefore there is no conflict between RID/ADR and the IMDG Code/ICAO TI. The only problem may be for consignors from non RID/ADR countries where such substances would not be subject to class 9 provisions under national legislation. Nevertheless, in the absence of an international convention governing a whole international multimodal transport operation, consignors outside RID/ADR countries have to make sure, before shipping dangerous goods to RID/ADR countries, that all relevant requirements of RID/ADR are complied with. Moreover, before offering the goods for transport by sea or air, they have to sign a declaration according to which “... the contents of the consignment .... are in all respects in proper condition for transport according to applicable international and national government regulations.

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