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Item 5 (a) of the provisional agenda

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

Name and description for UN 1345 RUBBER SCRAP or RUBBER SHODDY powdered or granulated

Transmitted by the Government of Spain^{*,}**

Summary

Executive summary:	Amendments to the name of UN 1345 “RUBBER SCRAP or RUBBER SHODDY powdered or granulated” of RID/ADR for its harmonization with the Model Regulations.
Action to be taken:	Harmonize with the name and description of the Model Regulations.
Related documents:	ECE/TRANS/WP.15/AC.1/2019/32.

Introduction

1. There are different cases where the name and description of the UN numbers is not the same in between Model Regulations and RID/ADR. In September 2019 Spain presented ECE/TRANS/WP.15/AC.1/2019/32 as a discussion document in which the differences for some UN numbers were shown.
2. The different delegations gave their comments on the background of the existing differences, and Spain was asked to develop the proposals to ensure harmonization and bring them to the Joint Meeting or to the Subcommittee, as appropriate for each case.

* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2).

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2020/37.

3. Having the same name and description for one UN number in all the modes by harmonizing with the Model Regulations and other transport modes, would enable a more rational approach and ease administrative burdens during transport.

4. Specifically, it has been observed that the denomination of UN 1345 is different between the Model Regulations and the RID/ADR:

UN Number	Model Regulations	RID/ADR
1345	RUBBER SCRAP or RUBBER SHODDY, powdered or granulated, not exceeding 840 microns and rubber content exceeding 45%	RUBBER SCRAP or RUBBER SHODDY, powdered or granulated, not exceeding 840 microns and rubber content exceeding 45%

5. For this case, RID/ADR cover this substance independently from the granulometry, while the Model Regulations restrict the cases to the ones that apparently cause more hazards.

6. In other modes of transport, this UN number have the same description as in the Model Regulations. The RID/ADR description covers more cases than the Model Regulations description, and this may lead to incongruences.

7. The name of this UN number should be harmonized with the one existing in the Model Regulations. This could be done by two alternative solutions:

1. Directly modifying name and description of UN 1345 and including the name and description of the Model Regulations (Proposal 1).

“RUBBER SCRAP or RUBBER SHODDY powdered or granulated, not exceeding 840 microns and rubber content exceeding 45%”.

2. Adding a new special provision SP 6xx to UN 1345 with the following text:

SP 6xx: “Rubber scrap or rubber shoddy in powder or granules of more than 840 microns and containing less than 45% of rubber, are not subject to RID/ADR”.

This solution is similar as the one already used for other UN numbers which in the Model Regulations have a long description, for example SP 586 for UN 1326,1352, and 1358.

8. Spain would prefer the first of these options, as this completely harmonizes not only with the Model Regulations, but also with other modal regulations.

Proposals

9. Spain suggests to harmonize the name and description for this UN number with the UN Model Regulations texts. Spain presents two alternative proposals (new text underlined):

Proposal 1

Modify the name and description of UN 1345 in Tables A and B of Chapter 3.2:

“RUBBER SCRAP or RUBBER SHODDY powdered or granulated, not exceeding 840 microns and rubber content exceeding 45%”.

Proposal 2

Add a new special provision SP 6xx for UN 1345 in Table A of Chapter 3.2, with the following text to be included into Chapter 3.3:

SP 6xx: “Rubber scrap or rubber shoddy in powder or granules of more than 840 microns and containing less than 45% of rubber, are not subject to the RID/ADR.”