Proposals for amendments to RID/ADR/ADN

Classification of UN 1872 LEAD DIOXIDE

Transmitted by the Government of Germany

Introduction

1. At the last Joint Meeting in September 2019, Germany submitted informal document INF.25 for the harmonisation of the classification of UN 1872 LEAD DIOXIDE, see also paragraph 41 of the report of this session (ECE/TRANS/WP.15/AC.1/156).

2. Currently UN 1872 LEAD DIOXIDE is classified differently within the UN Model Regulations, the IMDG Code and RID/ADR/ADN.

3. Whilst UN 1872 LEAD DIOXIDE is classified in RID/ADR/ADN as 5.1 + 6.1, packing group III, the UN Model Regulations and the IMDG Code classify the substance as Class 5.1, packing group III, with no subsidiary risk.

4. Checks have revealed that there is no reliable evidence for acute toxicity justifying the subsidiary risk of Class 6.1.

5. The reasons for the current entry in RID/ADR/ADN are unknown.

6. Germany has examined the question raised at the last Joint Meeting by the United Kingdom regarding carriage in bulk. Germany is of the opinion that there are no safety concerns regarding the carriage of UN 1872 LEAD DIOXIDE in bulk by land. Thus, in line with the applicable provisions for other substances of classification code O2 of packing group III, the two codes VC1 and VC2 as well as the corresponding provisions AP6 and AP7 should also be inserted in column 17 of Table A in Chapter 3.2.
Proposal

7. Germany proposes to harmonise the classification of UN 1872 LEAD DIOXIDE and to delete subsidiary risk "+ 6.1" in column (5) of Table A in Chapter 3.2 of RID/ADR/ADN.

8. This amendment would require the following consequential amendments in Chapter 3.2, Table A:

In column (3b), amend "OT2" to read:
"O2".

In column (12), amend "SGAN" to read:
"SGAV".

In column (17), insert:
"VC1
VC2
AP6
AP7".

In column (18), delete:
"CW28/CV28".

In column (20), amend "56" to read:
"50".