

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**

10 March 2021

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Item 5 (a) of the provisional agenda

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

Alternative wording for a harmonized Special Provision 644 to UN 2426 – Comments to ECE/TRANS/WP.15/AC.1/2021/13

Transmitted by the Government of Sweden

Introduction

1. Sweden would like to thank Spain for the work to harmonise the entries in the regulatory instruments for various modes of carriage in general, including the proposal for UN 2426 and its Special Provisions. However, Sweden suggests to bring this issue to the UN TDG Sub Committee first, in order to determine which of the requirements currently applicable in the IMDG Code and ADR/RID might be included in the UN Recommendation for UN 2426. The provisions in the UN Recommendation would then be transposed to the IMDG Code and ADR/RID.

Nevertheless, if others believe this proposal from Spain should be discussed at the Joint meeting, Sweden offers some comments to CE/TRANS/WP.15/AC.1/2021/13.

Discussion

2. Spain has identified that the provisions for the carriage of UN 2426 contains some inconsistencies between the Model Regulations, ADR/RID and the IMDG-code (carriage by air is not relevant for these solutions, as it is prohibited). Sweden believes that these inconsistencies should first be brought to the UN TDG Sub Committee, in order provide as much harmonisation as possible.

3. Regarding the proposal to amend the description for UN 2426 in Table A and B, Sweden would prefer to keep the name and description as currently written in Table A in Chapter 3.2 in ADR/RID, because the transport conditions are not harmonised with the UN Recommendations. In our view the description as written is also user-friendly and facilitates the classification of ammonium nitrate solutions.

4. Furthermore, while the proposal from Spain appears to resolve the current inconsistencies by harmonising the wording of the entries in ADR/RID with those of the Model Regulations and the IMDG code, Sweden is concerned that the changes may unintentionally alter the scope of the entry.

5. Spain draws a conclusion that if the solution contains not more than 93% ammonium nitrate it must contain at least 7% water, and therefore this limit of water content can be added to SP 644. However, this conclusion is based on the assumption that ammonium nitrate and water are the only two components in the mixtures. Sweden questions whether this is always the case, as these solutions also contain added substances to ensure quality and stability, and sometimes comprise also other nitrate salts (other than ammonium nitrate).

6. As proposed by Spain, the temperature limit of 140 °C for carriage currently in the IMDG-code is to be included in SP 644. This would be an actual change to the ADR/RID that will pose a new limit on the carriage of ammonium nitrate solutions in containment systems other than those tanks to which TU29 apply. While Sweden does not necessarily believe that this would be problematic in practice, some further investigations on the impact and consequences before imposing this new restriction seem appropriate.

7. Sweden also believes that the conditions for transport could be made clearer by separating the already existing limitations on the content of combustible materials from those on the chlorine level, as they are two unrelated parameters.

Proposals

8. Sweden's first choice is that the issue brought forward by Spain in proposal 2021/13 is forwarded to the UN TDG Sub Committee, in order to first work out whether any harmonisation could be done at the level of the Model Regulations.

9. However unless the Spanish proposal is forwarded to the UN TDG Sub Committee, Sweden would like to propose the following amendments to the proposal in 2021/13 from Spain:

Proposal 1

Sweden proposes to delete the proposed amendment of the description for UN 2426 in Table A and B under point 21 and maintain it as is, i.e.:

“AMMONIUM NITRATE, LIQUID, hot concentrated solution, in a concentration of more than 80 % but not more than 93 %”.

Proposal 2

Sweden proposes the following alternative wording for Special Provision 644 as an alternative to the proposed wording by Spain (new text in bold and underlined, text in square brackets subject to discussion, see under Discussion above):

“This entry applies to hot concentrated solutions containing more than 80% and not more than 93% ammonium nitrate.”

This substance is admitted for carriage, provided that:

- **[The solution contains at least 7% water;]**
 - The pH is between 5 and 7 measured in aqueous solution of 10% of the substance carried;
 - The solution does not contain more than 0.2% combustible material;
 - **The solution does not contain** chlorine compounds in quantities such that the chlorine level exceeds 0.02%; **and**
 - **[The maximum transport temperature of the solution is 140 °C].”**
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