
Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

11 June 2021

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-eighth session

Geneva, 28 June-2 July 2021

Item 6 (d) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: other miscellaneous proposals

Interpretation problem in sub-section 7.5.2.3

Transmitted by the Council on Safe Transportation of Hazardous Articles (COSTHA)

Introduction

1. COSTHA submitted ST/SG/AC.10/C.3/2021/25 to address a segregation problem identified in ADR 7.5.2.3. The problem was discussed at the autumn 2019 session of the Joint Meeting in informal document INF.40, 107th session WP.15 in informal document INF.14 and 108th session of WP.15 in ECE/TRANS/WP.15/2020/6. As a result of that discussion, it was recommended the paper be presented to the UN Subcommittee and specifically the Explosives Working Group for discussion considering the topic addresses the segregation of explosives from other goods on a vehicle.
2. The key question is whether a substance that is a Class 4.1 or 5.2 but is required to have an explosive label is permitted by the mixed loading provisions to be on the same vehicle with other dangerous goods when the vehicle has more than one or more closed containers on the vehicle (see ST/SG/AC.10/C.3/2021/25, Figure 1).
3. Per the first sentence in ADR 7.5.2.3, there would be no prohibition for such substances to be mixed on the same vehicle but in separate closed containers.
4. However, the second sentence provides for mixed loading for explosives if the provisions of 7.5.2.1 and 7.5.2.2 are met. Yet neither of these sentences address entries that are Classes 4.1 or 5.2 with explosive subsidiary hazard.
5. There are eight (8) entries that are impacted by this issue:
 - UN 3101 (5.2+1)
 - UN 3102 (5.2+1)
 - UN 3111 (5.2+1)
 - UN 3112 (5.2+1)
 - UN 3221 (4.1+1)
 - UN 3222 (4.1+1)
 - UN 3231 (4.1+1)
 - UN 3232 (4.1+1)
6. The intention of ST/SG/AC.10/C.3/2021/25 is to request guidance from the UN Sub-Committee (and the Explosives Working Group) as to whether packages bearing labels of model numbers 4.1 or 5.2 and 1 are permitted as mixed loading when on one vehicle but within separate closed containers. If this is permitted, then we request comment on the wording in 7.5.2.3 and whether it needs to be revised. If this is not permitted the complete sub-section 7.5.2.3 should be deleted, because there is no case where it can be applied.