
Economic and Social Council

Inland Transport Committee

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Working Party on the Transport of Dangerous Goods

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Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)

Forty-first session

Geneva, 23-27 January 2023

Item 5 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN: other proposals

The reclassification of UN 1918, ISOPROPYLBENZENE (cumene) and substances containing cumene at or above 0.1%

Transmitted by FuelsEurope

Introduction

1. According to Commission Delegated Regulation (EU) 2022/692, also designated as the 18th ATP to the Regulation on Classification, Labeling and Packaging of Substances and Mixtures (CLP Regulation), Cumene is assigned a harmonized (mandatory) classification for carcinogenicity, category 1B, with effect of 23 November 2023.
2. The adoption of Regulation (EU) 2022/692 triggers an amendment to Annex VI to Regulation (EC) No. 1272/2008. With regards to CMR substances, ADN refers to this regulation, particularly in 3.2.4.3., A, 9, with a footnote 3, Annex VI: "Harmonized classification and labelling for certain hazardous substances".
3. Under CLP Article 11(1), all products containing cumene in concentrations at or above 0.1% must therefore also receive that classification, regardless of the role of cumene in the product.

I. Consequences of the new carcinogenicity classification of UN 1918, ISOPROPYLBENZENE (cumene)

4. Consequently, all products containing cumene in concentrations at or above 0.1% must be reclassified under CLP for carcinogenicity, category 1B (unless they already carry that classification, or category 1A).
5. Substances identified as potentially containing cumene in concentrations at or above 0.1% are:
 - UN 1223 KEROSENE
 - UN 1307 XYLENES
 - UN 1863 FUEL, AVIATION, TURBINE ENGINE
6. In accordance with GHS, Chapter 3.5, 3.6, 3.7, a substance meeting the criteria for cat. 1A or 1B must be assigned the "CMR" attribute, which results in a reconsideration of transport requirements of affected substances under the regulations annexed to the ADN.

7. Whereas the relevant Safety Data Sheets (SDS) are being updated to reflect the substance's carcinogenicity, the resulting change of classification to "CMR" in ADN could only be implemented for the 2025 version, creating a situation where the affected substance's actual dangers deviate from the dangers in the tables of ADN.

II. Proposal for the forty-first session

8. In view of the new insights on subject product dangers and given that any changes to the ADN can only take effect as per 1 January 2025, FuelsEurope requests the Safety Committee to have a discussion to allow a temporary derogation from the requirements of ADN by means of a multilateral agreement (MA) in the context of ADN 1.5.1. to allow the transport of affected substances of UN 1918, UN 1223, and UN 1307 under the provisions of ADN 2023, until such time that ADN 2025, as amended, comes into force.

III. Proposals for new and amended entries in Table C for 2025

9. FuelsEurope proposes the following amendments to Table C as well as new entries as follows: (new text in bold and underlined; deleted text in strikethrough).

10. Amended entry for UN 1918 ISOPROPYLBENZENE (cumene) in 3.2.3.2 Table C:

UN No. or substance identification No.	Name and description	Class	Classification code	Packing group	Dangers	Type of tank vessel	Cargo tank design	Cargo tank type	Cargo tank equipment	Opening pressure of the pressure relief valve/high velocity vent valve, in kPa	Maximum degree of filling in %	Relative density at 20 °C	Type of sampling device	Pump room below deck permitted	Temperature class	Explosion group	Anti-explosion protection required	Equipment required	Number of cones/blue lights	Additional requirements/Remarks
(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
	3.1.2	2.2	2.2	2.1.1.3	5.2.2 / 3.2.3.1	1.2.1 / 7.2.2.0.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	7.2.4.21	3.2.3.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	1.2.1	1.2.1 / 3.2.3.3	1.2.1 / 3.2.3.3	8.1.5	7.2.5	3.2.3.1
1918	ISOPROPYLBENZENE (cumene)	3	F1	III	3+N2+ CMR	N	3 2	3			97	0,86	3	Yes	T2 ¹²	IIA ⁸	Yes	PP, EP , EX, TOX , A	0	

11. New entry for UN 1223 KEROSENE in 3.2.3.2 Table C:

UN No. or substance identification No.	Name and description	Class	Classification code	Packing group	Dangers	Type of tank vessel	Cargo tank design	Cargo tank type	Cargo tank equipment	Opening pressure of the pressure relief valve/high velocity vent valve, in kPa	Maximum degree of filling in %	Relative density at 20 °C	Type of sampling device	Pump room below deck permitted	Temperature class	Explosion group	Anti-explosion protection required	Equipment required	Number of cones/blue lights	Additional requirements/Remarks
(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
	3.1.2	2.2	2.2	2.1.1.3	5.2.2 / 3.2.3.1	1.2.1 / 7.2.2.0.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	7.2.4.21	3.2.3.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	1.2.1	1.2.1 / 3.2.3.3	1.2.1 / 3.2.3.3	8.1.5	7.2.5	3.2.3.1
1223	KEROSENE (containing cumene)	3	F1	III	3+N2+ CMR	N	3 2	3			97	≤ 0,83	3	Yes	T3	IIA ⁷⁾	Yes	PP, EP , EX, TOX , A	0	14

12. 3 new entries for UN 130 XYLENES in 3.2.3.2 Table C:

UN No. or substance identification No.	Name and description	Class	Classification code	Packing group	Dangers	Type of tank vessel	Cargo tank design	Cargo tank type	Cargo tank equipment	Opening pressure of the pressure relief valve/high velocity vent valve, in kPa	Maximum degree of filling in %	Relative density at 20 °C	Type of sampling device	Pump room below deck permitted	Temperature class	Explosion group	Anti-explosion protection required	Equipment required	Number of cones/blue lights	Additional requirements/Remarks
(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
	3.1.2	2.2	2.2	2.1.1.3	5.2.2 / 3.2.3.1	1.2.1 / 7.2.2.0.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	7.2.4.21	3.2.3.1	3.2.3.1 / 1.2.1	3.2.3.1 / 1.2.1	1.2.1	1.2.1 / 3.2.3.3	1.2.1 / 3.2.3.3	8.1.5	7.2.5	3.2.3.1
1307	XYLENES (mixture containing cumene , with melting point ≤ 0° C)	3	F1	II	3+N2± CMR	N	3 2	3			97		3	Yes	T1 ¹²	IIA	Yes	PP, EP , EX, TOX , A	1	
1307	XYLENES (mixture containing cumene , with melting point ≤ 0° C)	3	F1	III	3+N2± CMR	N	3 2	3			97		3	Yes	T1 ¹²	IIA	Yes	PP, EP , EX, TOX , A	0	
1307	XYLENES (mixture containing cumene , with 0° C < melting point ≤ 13° C)	3	F1	III	3+N2± CMR	N	3 2	3	2		97		3	Yes	T1 ¹²	IIA	Yes	PP, EP , EX, TOX , A	0	6: +17 °C; 17

IV. Remarks

13. For UN 1863, it should be noted that ADN provides already possibilities to transport those substances as CMR. Therefore, no changes or amendments with respect to UN 1863 in Table C are required.

14. The proposals under paragraphs 10, 11 and 12 are limited to Table C of ADN only; as far as could be established, the added CMR attribute does not trigger changes to the relevant entries of UN 1918; UN 1223 and UN 1307 in Table A of ADN. Similarly, no changes to these relevant entries will be required in ADR and/or RID.

V. Interlinkage to Sustainable Development Goals

15. New insights in the (additional) dangers of substances and considering its consequences on the ongoing safe handling, storage and transport of those hazardous materials can be linked to Sustainable Development Goal 3: Good health and well-being – Reducing health risks of hazardous materials.

16. As this links to sustainable transport, also Sustainable Development Goal 11 can be considered.

V. Action to be taken

17. The Safety Committee is invited to have a discussion as proposed under paragraph 8, and to act as it deems appropriate.

18. The informal working group on Substances is invited to consider the proposals and remarks under paragraph 10, 11, 12, 13 and 14, and to act as it deems appropriate.
