



**Economic and Social
Council**

**Distr.
GENERAL**

**TRANS/WP.15/1999/2
5 January 1999**

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

**Working Party on the Transport
of Dangerous Goods**
**(Sixty-sixth session,
Geneva, 3-7 May 1999)**

PROPOSAL FOR AMENDMENTS TO ANNEXES A AND B OF ADR

**Transport of certain substances of class 4.1 without air circulation
between packages**

Submitted by the Government of Germany

Executive Summary:	There is no need formally to apply the rules of para 4 of marginal 41 414 to all substances of class 4.1 for reasons of safety. Here a limitation should be made to self-decomposing substances of items 31 to 50.
Action to be taken:	Clarification in marginal 41 414 (4) with the following wording: <i>"Packages of items 31 to 50 shall be loaded ... "</i> (rest unchanged)
Related documents:	none

Transport of certain substances of class 4.1 without air circulation between packages

Introduction:

The text of marginal 41 414 para 4 ADR in class 4.1 was drafted to align with the text of marginal 52 414 para 4 in class 5.2. No limitation as regards applicability to certain substances/items is made in paragraph 4 of either marginal, so that the requirements laid down in para 4 apply to all substances/items of the respective class. This is necessary for safety reasons as far as class 5.2 is concerned, owing to the relation between SADT and control temperature. However the incorporation of the text taken from marginal 52 414 para 4 in marginal 41 414 para 4 **without** limitation to self-decomposing substances of items 31 to 50 has created an absurd situation where the requirements of para 4 of marginal 41 414 now formally apply to all substances of class 4.1. For example, for red phosphorus of class 4.1, item 11° (c), compliance with these rules would not improve safety.

Proposal:

We request clarification in marginal 41 414 (4) and propose the following wording:

"Packages of items 31 to 50 shall be loaded ... " (rest unchanged)

Justification:

Safety:	The amendment does not result in lower safety.
Feasibility:	The amendment makes matters easier in all fields of the production and transport of dangerous goods of class 4.1 (except for items 30 to 50) according to ADR.
Enforceability:	The advantages brought by the proposed amendment can be described.
