

**Economic and Social
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INLAND TRANSPORT COMMITTEE****Working Party on the Transport of Dangerous Goods****Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Geneva 9-13 September 2002)****DEFINITION OF PACKING GROUP FOR SUBSTANCES OF CLASS 3****Transmitted by the European Council of Chemical Manufacturers' Federation (CEFIC) */**

SUMMARY	
Executive Summary:	Bring the definitions for Packing Group of substances and articles of Class 3 in RID/ADR, in line with those that are used in the UN Model Regulations.
Action to be taken:	Amend the definitions for Packing Group I, II and III in subsection 2.2.3.1.3, and remove two Notes in subsection 2.2.3.1.1 and two Footnotes in section 2.2.8.3 as they will have become redundant.
Related documents:	INF 31 of the Joint Meeting, held in Bern 18-22 March 2002

Introduction

At the last Joint Meeting in Bern, 18-22 March 2002, CEFIC introduced INF.31 (the document is posted on the UNECE website as INF.29) proposing a correction to RID/ADR 2001. It proposed the (re-)introduction of a reference to the boiling point or initial boiling point in Note 6 of subsection 2.2.3.1.1 so that highly flammable and highly corrosive liquids with a boiling point or initial boiling point exceeding 35°C could be classified in Class 8. This proposal was adopted.

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In the same document CEFIC proposed to bring the definitions of Packing Groups I, II and III for substances of Class 3 in line with those of the UN Model Regulations. Many delegations supported the proposal but the Joint Meeting requested a formal proposal (see TRANS/WP.15/AC.1/88, para. 63), which is offered with the current document.

Proposal

- a) Amend the definitions for Packing Group I, II and III in subsection 2.2.3.1.3 to read as follows:.

Packing Group	Flash Point (closed cup)	Initial Boiling Point
I	--	≤35°C
II	< 23°C	>35°C
III	≥23°C ≤61°C	>35°C

- b) Delete the following Notes and Footnotes, which apply to liquids that are flammable and corrosive.

- Note 5 of subsection 2.2.3.1.1
- Note 6 of subsection 2.2.3.1.1
- Footnote c of subsection 2.2.8.3
- Footnote b of subsection 2.2.8.3

Justification

These definitions are much simpler to handle.

The adoption of these definitions does not result in the need to reclassify substances in RID/ADR:

- There is no difference in the classification of substances between the Dangerous Goods Lists of RID/ADR and the UN Model Regulations.
- The annex at the end of this document illustrates how the 2 sets of definitions match as well as how the table of precedence of hazards makes the set of Notes and Footnotes redundant for liquids that are flammable and corrosive.
- The adoption of the new definition of the Packing Groups for Class 3 in RID/ADR does not affect the classification of flammable toxic liquids. The table of precedence of hazards together with Notes 3 and 4 of subsection 2.2.3.1.1 and Footnotes j and k of subsection 2.2.61.3 cater for exceptions related to use as pesticides and difference between oral and dermal toxicity.

More importantly this would be a further step towards harmonization as the UN definition is already used in the IMDG code and IATA Dangerous Goods Regulations.

Safety implications

None

Feasibility

No problem as there is no need for re-classification of substances.

Enforceability

No problem

ANNEX: Table of precedence of hazards (class 3 – class 8)

RID/ADR (current criteria)	<u>Class 8, PG I</u> Highly corrosive	<u>Class 8, PG II</u> Corrosive	<u>Class 8, PG III</u> Slightly corrosive	UN (criteria)	
Class 3, PG I Flammable and $BP \leq 35^{\circ}\text{C}$ or $FP < 23^{\circ}\text{C}$ and HC	3, PG I (Footnote b)	3, PG I	3, PG I	<u>Class 3, PG I</u>	
				(flammable)	$BP \leq 35^{\circ}\text{C}$
Class 3, PG II $FP < 23^{\circ}\text{C}$ and (not PG I)	8, PG I (Note 6)	3, PG II	3, PG II	<u>Class 3, PG II</u>	
				$FP < 23^{\circ}\text{C}$	$BP > 35^{\circ}\text{C}$
Class 3, PG III $23^{\circ}\text{C} \leq FP \leq 61^{\circ}\text{C}$	8, PG I (Note 5)	8, PG II (Note 5)	3, PG III (Footnote c)	<u>Class 3, PG III</u>	
				$23^{\circ}\text{C} \leq FP \leq 60.5^{\circ}\text{C}$	$BP > 35^{\circ}\text{C}$

- **Note 5 of subsection 2.2.3.1.1:** Corrosive liquids having a $FP \geq 23^{\circ}\text{C}$ are substances of class 8 (see 2.2.8.1)
- **Note 6 of subsection 2.2.3.1.1** (*amended as approved in the previous Joint Meeting*): UN No. 2734 Amines, liquid, corrosive, flammable, n.o.s., UN No. 2734 Polyamines, liquid, corrosive, flammable, n.o.s. and UN No. 2920 Corrosive liquid, flammable, n.o.s., highly corrosive and having a boiling point or an initial boiling point exceeding 35°C , are substances of Class 8 (see 2.2.8.1)
- **Footnote b of subsection 2.2.8.3:** Flammable corrosive liquids with $FP < 23^{\circ}\text{C}$, other than UN 2734 and 2920, are substances of Class 3
- **Footnote c of subsection 2.2.8.3:** Flammable slightly corrosive liquids having a FP between 23°C and 61°C , are substances of class 3