



**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Thirty-ninth session**

Geneva, 20–24 June 2011

Item 8 of the provisional agenda

**Global harmonization of transport of dangerous goods
regulations with the Model Regulations****Assignment of Packing Group I substances to various UN
entries. Differences between the UN Model Regulations and
RID/ADR/ADN****Transmitted by the expert from the United Kingdom¹**

1. At the March 2011 session of the RID/ADR/ADN Joint Meeting, the Government of the United Kingdom submitted document ECE/TRANS/WP.15/AC.1/2011/14 drawing attention to differences between the United Nations Model Regulations and RID/ADR/ADN. RID/ADR/ADN allows the assignment of Packing Group I to UN numbers 1169, 1197, 1266, 1286 and 1287, where as the Model Regulations does not. The meeting concluded that although two of the UN entries (UN 1169 and UN 1197) were confirmed by industry as not requiring a Packing Group I assignment, it could be feasible that all five of the UN numbers listed may require this in the future.
2. In order to align with the Model Regulations and create modal harmonisation the Joint Meeting therefore felt that this issue should be first raised at the Sub-Committee of Experts on the Transport of Dangerous Goods. As these entries may be required in the future, should the Model Regulations be amended for these UN entries to include assignment to Packing Group I?
3. The expert from the United Kingdom asks therefore that the Sub-Committee consider the issue as explained in the annex reproducing the text submitted to the Joint Meeting and give its opinion.

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

Annex

Introduction

1. At the March 2010 session of the Joint Meeting during the discussion on document ECE/TRANS/WP.15/AC.1/2010/11 and informal document INF.30, the United Kingdom highlighted the difference between RID/ADR/ADN and the UN Model Regulations regarding the assignment of various UN entries to Packing Group I. RID/ADR/ADN allows for the assignment of Packing Group I to UN numbers 1169, 1197, 1266, 1286 and 1287 whereas the UN Model Regulations does not.
2. The United Kingdom believes that there should not be modal differences for the transport of these UN numbers. The International Maritime Dangerous Goods Code and the International Civil Aviation Organization Technical Instructions do not have Packing Group I entries for any of these five UN numbers which can mean practical problems for a multimodal journey.

Background

3. The United Kingdom sought views from the Joint Meeting as to whether there was a need to retain Packing Group I assignment for these entries in RID/ADR/ADN. Some States believed that the assignment should be retained in RID/ADR/ADN as there were good reasons for applying Packing Group I in certain circumstances but the specific details of these reasons were not provided. Others argued that Packing Group I should not be assigned as it is not needed for these UN numbers and agreed with the United Kingdom for the need for modal harmonisation.
4. The report of the discussion as detailed in paragraph 35 of ECE/TRANS/WP.15/AC.1/118 concluded that the chemical industry representatives were invited to check whether the assignment of Packing Group I was justified for these UN numbers and that the United Kingdom would submit alignment proposals based on the research provided by the chemical industry.
5. The European Chemical Industry Council (CEFIC) has advised the United Kingdom that this issue was raised with their members and that there was no request to maintain Packing Group I entries of UN No. 1169 and UN No. 1197 and as such CEFIC would support their deletion from RID/ADR/ADN. The United Kingdom has not received any other information from industry regarding the allocation of Packing Group I to UN numbers 1266, 1286 and 1287.
6. Without confirmation of the need for the retention of Packing Group I to UN numbers 1266, 1286 and 1287 and in recognition that the UN Model Regulations does not have this assignment, the United Kingdom also proposes the deletion of the allocation of Packing Group I to these UN numbers.
7. However if evidence is provided which proves the need for the retention of Packing Group I for any of these entries then the United Kingdom would be prepared to raise this issue at the UN Sub-Committee of Experts for the Transport of Dangerous Goods in due course so that harmonization can be achieved.

Proposal

8. In Chapter 3.2 Table A, delete the entries for Packing Group I for UN Nos. 1169, 1197, 1266, 1286 and 1287.

Justification

9. These amendments would provide for harmonisation of RID/ADR/ADN with the UN Model Regulations for the transport of these substances.
