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**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-third session
Geneva, 30 June-9 July (a.m.) 2008
Item 4 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Assignment of Special Provision (SP) 274

Transmitted by the (European Chemical Industry Council (CEFIC))*

I BACKGROUND

1. At the December 2007 session of the Sub-Committee, CEFIC presented informal document UN/SCETDG/32/INF.25, which provided information about a discussion taking place in the RID/ADR/ADN Joint Meeting concerning discrepancies in the assignment of SP 274 between modal regulations. Indeed RID/ADR/ADN assigns SP 274 to a larger number of substances than the UN Model Regulations, the International Maritime Dangerous Goods (IMDG) Code and the ICAO Technical Instructions do. This difference leads to problems in intermodal transport of such substances, where the first leg of a journey may not require supplementing the Proper Shipping Name with the technical name whereas the second part of the journey does. The Sub-Committee noted with satisfaction the work undertaken and agreed to address the issue in its next session taking into account the results of the Joint Meeting session in March 2008 (see ST/SG/AC.10/C.3/64, paras. 34-35) 2. The Joint Meeting in March 2008

* In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.3/60, para. 100 and ST/SG/AC.10/34, para. 14) (Provisions for the transport of dangerous goods in open cryogenic receptacles)

approved the report of the informal working group, submitted by CEFIC as formal document ECE/TRANS/WP.15/AC.1/2008/3 and corresponding informal document INF.3, as a whole. It adopted the proposal to remove SP 274 from the UN numbers listed in paragraph 35 of the document, and endorsed the recommendations made in paragraph 36 of this document. This paragraph recommended to add SP 274 to the remaining substances and to create a number of special provisions in the UN Model Regulations so that harmonisation amongst modal regulations would be achieved.

3. In order to facilitate the discussion, large parts of the ECE/TRANS/WP.15/AC.1/2008/3 are reproduced herewith as they provide information about the arguments raised during the discussion in the informal working group in October 2007, attended by representatives from Austria, Belgium, France, Germany, Netherlands, United Kingdom and CEFIC.

II STRUCTURE OF THE DISCUSSION

4. The comments provided for the list of substances, which have SP 274 in RID/ADR/ADN but not in the other modal regulations were grouped as follows:

- (a) Comments related to the link with special provisions dealing with classification and for which the removal of SP 274, could lead to substances being classified wrongly or being carried despite being prohibited for carriage;
- (b) Comments related to the need of information for stowage and segregation purposes in the IMDG Code;
- (c) Comments related to the need for the technical name, especially for toxic substances;
- (d) Specific comments on UN 1075 (Petroleum gases);
- (e) Comments related to medicines (UN Nos. 1851, 3248 and 3249);
- (f) Comments related to gas samples (UN Nos. 3167, 3168 and 3169);
- (g) Comments related to metal catalysts (UN Nos. 1378 and 2881);
- (h) Specific comment on inorganic peroxides (UN 1483);
- (i) Comments on elevated temperature substances (UN Nos. 3256, 3257 and 3258).

III DISCUSSION

A. Link with special provisions dealing with classification

5. The majority view was to require SP 274 for those UN numbers for which a special provision indicated that the carriage of a certain substance, corresponding to the description of the UN number, is prohibited.

6. The special provisions envisaged are SP 103, 559, 604, 605, 606 and 608. They have been highlighted in green in Table 1 of informal document INF.3.

Justification:

7. This helps carriers (see ADR 1.4.2.2.1 (a)) and enforcement officers to check if the goods are authorised for carriage. Additionally it provides an extra reminder to consignors.
8. It should be noted that the substances mentioned in these special provisions correspond to those also listed in SP 900 of the IMDG Code (as indicated in Table 1 of informal document INF.3), and in Table 2.1A of the International Air Transport Association's Dangerous Goods Regulations (DGR), which both prohibit the transport of certain substances by respectively sea and air.
9. The other special provisions (all in the "500" range) do not relate to the prohibition of carriage but are only a user-friendly reminder that substances should be classified in the appropriate class under the appropriate UN number.

B. Need of information for stowage and segregation purposes

10. All participants agreed that SP 274 is not required for the purpose of stowage and segregation according to the IMDG Code.

Justification:

11. The IMDG Code (see 3.1.4.4) has grouped substances into "segregation groups" for assigning segregation provisions so that there is no longer a need for the technical name.

(The need for requiring SP 274 for aquatic pollutants was briefly discussed but was not considered to be an issue for this working group as the RID/ADR/ADN Joint Meeting had recently decided that there was no need for an additional mention of "aquatic pollutant" on the transport document for substances classified as aquatic pollutant.)

C. Need for the technical name, especially for toxic substances

12. The majority view was to require SP 274 for all substances of Division 6.1 (particularly for PG I substances, as even small amounts can present a major risk, but generally also for PG II and III substances, as this is in line with the current assignment of SP 274 to substances of Division 6.1).

Justification:

13. Knowledge of the technical name of toxic substances may speed up the provision of appropriate first aid measures, as e.g. Poison Centres, may more rapidly identify adequate measures.
14. All participants agreed not to require SP 274 for substances of other classes for which the name was sufficiently clear so that the provision of the technical name would not lead to taking different emergency measures.

D. Specific comment on UN 1075 (Petroleum gases)

15. All participants agreed that SP 274 should be kept.

Justification:

16. Without SP 274 it would be impossible to determine the maximum permissible filling ratio.

17. There was however no need to introduce this requirement in the UN Model Regulations as this is a specific RID/ADR/ADN issue.

18. Formal alignment with the UN Model Regulations could be achieved by incorporating the requirement of SP 274 into SP 583 ("This entry covers, inter alia, mixtures which as Mixture A, have a vapour pressure at 70 °C not exceeding 1.1 MPa (11 bar) and a density at 50 °C not lower than 0.525 kg/l etc.). However, this was not perceived as being a task for this working group.

E. Comments related to medicines (UN Nos. 1851, 3248 and 3249)

19. All participants, except the United Kingdom, agreed that SP 247 is required.

Justification:

20. Knowledge of the technical name will help to identify proper first aid measures (similar as justification in comment (c)).

21. The working group questioned whether SP 220 ("Only the technical name of the flammable liquid component of this solution or mixture shall be shown in parentheses immediately following the proper shipping name"), assigned to UN 3248 (Medicine liquid, flammable, toxic, n.o.s.), needs to be maintained or needs to be amended.

F. Comments related to gas samples (UN Nos. 3167, 3168 and 3169)

22. All participants agreed that there was no need to require SP 274.

Justification:

23. The last paragraph of 2.1.4.1 in RID/ADR/ADN explicitly does not require the technical name when an n.o.s. entry is used to carry the sample (which is actually the case for UN Nos. 3167, 3168 and 3169).

G. Comments related to metal catalysts (UN Nos. 1378 and 2881)

24. All participants agreed that SP 247 is required.

Justification:

25. The technical name may provide information that could be important to identify the proper extinguishing medium (e.g. to know whether CO₂ could be used) or the other substances the catalyst could react with.

H. Specific comment on inorganic peroxides (UN 1483)

26. All participants agreed that there was no need to require SP 274.

Justification:

27. Knowledge of the technical name will not lead to different emergency measures being taken.

I. Comments on elevated temperature substances (UN Nos. 3256, 3257 and 3258)

28. There was a majority view to require SP 274.

Justification:

29. Knowledge of the technical name will help emergency services selecting the proper extinguishing medium (e.g. presence of alcohol in the substance carried) or will help estimating the temperature (e.g. melting point of the substance carried).

IV CONCLUSION

30. In accordance with the decisions taken, the assignment of SP 274 was reviewed:

- (a) SP 274 is proposed to be retained in RID/ADR/ADN and proposed to be assigned also to these entries in the UN Model Regulations if either of the following comments applies:
- Comment (A), if also SP 103, SP 559, SP 604, SP 605, SP 606 or SP 608¹ applies;
 - Comment (C) (substances of Division 6.1);
 - Comment (E) (medicines);
 - Comment (G) (metal catalysts); or
 - Comment (I) (elevated temperature substances);

¹ It is proposed to take up the contents of these special provisions also in the UN Model Regulations.

- (b) SP 274 is proposed to be removed from entries in RID/ADR/ADN if any of the following comments, but none of the comments listed above, applies:
- Comment (B) (segregation);
 - Comment (F) (gas samples); or
 - Comment (H) (inorganic peroxide);
- (c) SP 274 is proposed to be retained for UN 1075 in RID/ADR/ADN but not proposed to be assigned to this entry in the UN Model Regulations.

V OUTCOME OF THE RID/ADR/ADN JOINT MEETING OF MARCH 2008

31. The Joint Meeting agreed with the following:

For UN Nos. 1353, 1373, 1389, 1390, 1391 (both entries), 1392, 1393, 1421, 1477 (PG II and III), 1481 (PG II and III), 1483 (PG II and III), 1740 (PG II and III), 2430 (PG I, II and III), 2583, 2584, 2585, 2586, 2837 (PG II and III), 2985, 2986, 2987, 2988, 3089 (PG II and III), 3145 (PG I, II and III), 3167, 3168, 3169, 3211 (PG II and III), 3215, 3216, 3218 (PG II and III), 3401 and 3402, delete “274” in column (6).

Note: The corresponding entries are those that are highlighted in orange in Table 2 of informal document INF.3.

VI PROPOSAL

36. It is proposed to amend the UN Model Regulations as follows:

- (a) For UN Nos. 1378, 1450, 1461, 1462, 1482 (PG II and III), 1549, 1556 (PG I, II and III), 1557 (PG I, II and III), 1564 (PG II and III), 1566 (PG II and III), 1583 (PG I, II and III), 1655 (PG I, II and III), 1851 (PG II and III), 1935 (PG I, II and III), 2024 (PG I, II and III), 2025 (PG I, II and III), 2026 (PG I, II and III), 2291, 2570 (PG I, II and III), 2627, 2630, 2742, 2856, 2881 (PG I, II and III), 3141, 3144 (PG I, II and III), 3210 (PG II and III), 3212, 3213 (PG II and III), 3214, 3219 (PG II and III), 3248 (PG II and III), 3249 (PG II and III), 3256, 3257, 3258, 3283 (PG I, II and III), 3284 (PG I, II and III), 3285 (PG I, II and III), 3361, 3362, 3340 (PG I, II and III) add SP 274 in column 6 of the Dangerous Goods List of the UN Model Regulations

Note: The corresponding entries are those that are NOT highlighted in orange in Table 2 of informal document INF.3.

- (b) Create new special provisions, with similar wording as SP 559, 604, 605, 606 and 608 in Chapter 3.3 and to add them to column 6 of the Dangerous Goods List of the UN Model Regulations for the following entries:

- SP XX1 (559): UN 3212;
- SP XX2 (604): UN 1450 and UN 3213;
- SP XX3 (605): UN 1461 and UN 3210;
- SP XX4 (606): UN 1462;
- SP XX5 (608): UN 1482 and UN 3214.

Note: The corresponding texts are highlighted in green in Table 1 of informal document INF.3.
