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**UN 2478 ISOCYANATES, FLAMMABLE, TOXIC, N.O.S OR
ISOCYANATE SOLUTION, FLAMMABLE, TOXIC, N.O.S**

Submitted by the European Chemical Industry Council (CEFIC) */

SUMMARY

Analytical summary: Rectification of an illogical situation concerning UN 2478.

Action to be taken: To delete Special Provision 539 for UN 2478 PG III

Related documents: None.

Introduction:

The restructured RID/ADR has pointed out a contradiction in the classification of UN 2478 Isocyanates, Flammable, Toxic, N.O.S Or Isocyanate Solution, Flammable, Toxic, N.O.S. Indeed if the Special Provision 539 is applied then UN 2478 should not be listed in Table A in Class 3 PG III.

CEFIC does not see the logic of such Special Provision. Moreover this SP 539 does not exist in the UN Recommendations, neither in the IMDG Code or the IATA DG Code.

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It is proposed to refer, as for other products, to the Table of precedence of hazards and to delete the SP 539.

Proposal:

To delete Special Provision 539 for UN 2478 PG III.

Justification:

Deleting special provision 539 will clarify the classification process. The table of precedence of hazards will apply as in the UN Recommendations, IMDG Code and IATA DG Code.
