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Bern, 21–25 March 2011

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Assignment of special provision 601 to UN Nos. 3175 and 3243

Transmitted by the European Chemical Industry Council CEFIC^{1, 2}

Introduction

1. According to special provision 601, pharmaceutical products (medicines), ready for use, which are substances manufactured and packaged for retail sale or distribution for personal or household consumption, are exempted from the requirements of RID/ADR/ADN. Special provision 601 is assigned to 37 entries of liquid and solid substances of classes 3, 6.1 and 9 with packing groups II and III (see annex).

2. If flammable liquid pharmaceutical products (e.g. UN Nos. 1169, 1170, 1197, etc) are absorbed in solids which are not subject to the requirements of RID/ADR/ADN, they may be carried under "UN 3175 SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S., Class 4.1, PG II" according to special provision 216. Although the liquid pharmaceuticals are themselves exempted from RID/ADR/ADN by special provision 601, they are no longer classified as UN No. 3175, although the risk has decreased.

¹ In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para.106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2011/4.

3. Similarly, if liquid toxic pharmaceutical products (e.g. UN No. 1851) are absorbed in solids which are not subject to the requirements of RID/ADR/ADN, they may be carried under "UN 3243 SOLIDS CONTAINING TOXIC LIQUID, N.O.S., Class 6.1, PG II" according to special provision 217. Although the liquid pharmaceuticals are themselves exempted from RID/ADR/ADN by special provision 601, they are no longer classified as UN No. 3243, although the risk has decreased.

4. It should be noted that the assignment of special provision 601 to pharmaceuticals consisting of liquid environmentally hazardous substances, absorbed in solids which are not subject to the requirements of RID/ADR/ADN, has already been realized. According to special provision 335 these substances have to be classified as "UN 3077 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S." to which special provision 601 has already been assigned.

Proposal

5. In Table A of RID/ADR/ADN:

For UN Nos. 3175 and 3243, add "601" in column (6).

Justification

6. As the risk with solid substances containing liquid pharmaceuticals is smaller than for the pure liquids, the assignment of special provision 601 to UN Nos. 3175 and 3243 will not reduce the current level of safety.

Annex

**Substances with special provision 601 in RID/ADR/ADN 2009
(37)**

[English only]

<i>UN</i>	<i>Name</i>	<i>Class</i>	<i>Code</i>	<i>Packing Group</i>	<i>Labels</i>	<i>Special Provision</i>
1169	EXTRACTS, AROMATIC, LIQUID (vapour pressure at 50 °C more than 110 kPa)	3	F1	II	3	601 640C
1169	EXTRACTS, AROMATIC, LIQUID (vapour pressure at 50 °C not more than 110 kPa)	3	F1	II	3	601 640D
1169	EXTRACTS, AROMATIC, LIQUID	3	F1	III	3	601 640E
1169	EXTRACTS, AROMATIC, LIQUID (having a flash-point below 23 °C and viscous according to 2.2.3.1.4) (boiling point not more than 35 °C)	3	F1	III	3	601 640F
1169	EXTRACTS, AROMATIC, LIQUID (having a flash-point below 23 °C and viscous according to 2.2.3.1.4) (vapour pressure at 50 °C more than 110 kPa, boiling point of more than 35 °C)	3	F1	III	3	601 640G
1169	EXTRACTS, AROMATIC, LIQUID (having a flash-point below 23 °C and viscous according to 2.2.3.1.4) (vapour pressure at 50 °C not more than 110 kPa)	3	F1	III	3	601 640H
1170	ETHANOL (ETHYL ALCOHOL) or ETHANOL SOLUTION (ETHYL ALCOHOL SOLUTION)	3	F1	II	3	144 601
1170	ETHANOL SOLUTION (ETHYL ALCOHOL SOLUTION)	3	F1	III	3	144 601
1197	EXTRACTS, FLAVOURING, LIQUID (vapour pressure at 50 °C more than 110 kPa)	3	F1	II	3	601 640C
1197	EXTRACTS, FLAVOURING, LIQUID (vapour pressure at 50 °C not more than 110 kPa)	3	F1	II	3	601 640D
1197	EXTRACTS, FLAVOURING, LIQUID	3	F1	III	3	601 640E
1197	EXTRACTS, FLAVOURING, LIQUID (having a flash-point below 23 °C and viscous according to 2.2.3.1.4) (boiling point not more than 35 °C)	3	F1	III	3	601 640F
1197	EXTRACTS, FLAVOURING, LIQUID (having a flash-point below 23 °C and viscous according to 2.2.3.1.4) (vapour pressure at 50 °C more than 110 kPa, boiling point of more than 35 °C)	3	F1	III	3	601 640G
1197	EXTRACTS, FLAVOURING, LIQUID (having a flash-point below 23 °C and viscous according to 2.2.3.1.4) (vapour pressure at 50 °C not more than 110 kPa)	3	F1	III	3	601 640H
1204	NITROGLYCERIN SOLUTION IN ALCOHOL with not more than 1% nitroglycerin	3	D	II	3	601
1219	ISOPROPANOL (ISOPROPYL ALCOHOL)	3	F1	II	3	601
1293	TINCTURES, MEDICINAL	3	F1	II	3	601
1293	TINCTURES, MEDICINAL	3	F1	III	3	601

<i>UN</i>	<i>Name</i>	<i>Class</i>	<i>Code</i>	<i>Packing Group</i>	<i>Labels</i>	<i>Special Provision</i>
1851	MEDICINE, LIQUID, TOXIC, N.O.S.	6.1	T1	II	6.1	221 274 601
1851	MEDICINE, LIQUID, TOXIC, N.O.S.	6.1	T1	III	6.1	221 274 601
1987	ALCOHOLS, N.O.S. (vapour pressure at 50 °C more than 110 kPa)	3	F1	II	3	274 601 640C
1987	ALCOHOLS, N.O.S. (vapour pressure at 50 °C not more than 110 Pa)	3	F1	II	3	274 601 640D
1987	ALCOHOLS, N.O.S.	3	F1	III	3	274 601
1993	FLAMMABLE LIQUID, N.O.S. (vapour pressure at 50 °C more than 110 kPa)	3	F1	II	3	274 601 640C
1993	FLAMMABLE LIQUID, N.O.S. (vapour pressure at 50 °C not more than 110 kPa)	3	F1	II	3	274 601 640D
1993	FLAMMABLE LIQUID, N.O.S.	3	F1	III	3	274 601 640E
1993	FLAMMABLE LIQUID, N.O.S. (having a flash-point below 23 °C and viscous according to 2.2.3.1.4) (boiling point not more than 35 °C)	3	F1	III	3	274 601 640F
1993	FLAMMABLE LIQUID, N.O.S. (having a flash-point below 23 °C and viscous according to 2.2.3.1.4) (vapour pressure at 50 °C more than 110 kPa, boiling point of more than 35 °C)	3	F1	III	3	274 601 640G
1993	FLAMMABLE LIQUID, N.O.S. (having a flash-point below 23 °C and viscous according to 2.2.3.1.4) (vapour pressure at 50 °C not more than 110 kPa)	3	F1	III	3	274 601 640H
3077	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S.	9	M7	III	9	274 335 601
3082	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S.	9	M6	III	9	274 335 601
3248	MEDICINE, LIQUID, FLAMMABLE, TOXIC, N.O.S.	3	FT1	II	3 +6.1	220 221 274 601
3248	MEDICINE, LIQUID, FLAMMABLE, TOXIC, N.O.S.	3	FT1	III	3 +6.1	220 221 274 601
3249	MEDICINE, SOLID, TOXIC, N.O.S.	6.1	T2	II	6.1	221 274 601

<i>UN</i>	<i>Name</i>	<i>Class</i>	<i>Code</i>	<i>Packing Group</i>	<i>Labels</i>	<i>Special Provision</i>
3249	MEDICINE, SOLID, TOXIC, N.O.S.	6.1	T2	III	6.1	221 274 601
3272	ESTERS, N.O.S.	3	F1	II	3	274 601
3272	ESTERS, N.O.S.	3	F1	III	3	274 601
