Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

15 August 2011

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 13-23 September 2011 Item 5 of the provisional agenda Interpretation of RID/ADR/ADN

Interpretation of 4.1.1.6 for limited quantities

Transmitted by the Government of France

Introduction

- 1. According to Chapter 3.4, section 4.1.10 concerning mixed packing does not apply to dangerous goods packed in limited quantities, but paragraph 4.1.1.6 does apply.
- 2. Yet paragraph 4.1.1.6 refers in its NOTE to section 4.1.10.
- 3. Around 170 substances that could be packed in limited quantities would be affected by the mixed packing provisions they are assigned to in Column (9b) of Table A of Chapter 3.2, as described in section 4.1.10.

Interpretation

- 4. We would like to ask the Joint Meeting whether section 4.1.10 applies to dangerous goods packed in limited quantities.
- 5. According to us, paragraph 4.1.1.6 which comes from the UN Recommendations well indicates that dangerous goods that react dangerously with each other shall not be packed together; because 4.1.10 does not exist in the UN Recommendations, it is not mentioned in 3.4, but in our opinion 4.1.10 is just a practical mean of applying 4.1.1.6. Therefore it should also apply to dangerous goods packed in limited quantities.

Proposition

6. If the Joint Meeting has the same interpretation, it could be good to clarify this in Chapter 3.4 by modifying paragraph 3.4.1.(d) to have :

"3.4.1.(d) Part 4, paragraphs 4.1.1.1, 4.1.1.2, 4.1.1.4 to 4.1.1.8 and section 4.1.10."

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