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Working Party on the Transport of Dangerous Goods

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Item 5 (b) of the provisional agenda
Proposals for amendments to RID/ADR/ADN:
new proposals

RID/ADR 7.5.2.1 – mixed loading prohibitions for packages for which no danger labels are prescribed

Transmitted by the Government of Germany *,**

Introduction

- 1. In Germany, the question has arisen in connection with the mixed loading prohibitions of RID/ADR 7.5.2 as to how to deal with packages that contain dangerous goods for which no danger labels are prescribed in Table A of Chapter 3.2 (UN 2211 and UN 3314).
- 2. Germany is of the view that there are no safety concerns with regard to the mixed loading of UN 2211 and UN 3314 with goods of classes 2 to 9. However, mixed loading with substances and articles of Class 1 should be prohibited, because when UN 2211 and UN 3314 are being carried, there is a risk of an explosive atmosphere developing. In addition, according to the table in RID/ADR 7.5.2.1, mixed loading with substances and articles of Class 1 is only possible to a very limited extent.

Proposal

3. Insert the following as a second sentence in RID/ADR 7.5.2.1:

^{*} In accordance with the programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/2018/21/Add.1, Cluster 9, (9.2)).

^{**} Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2018/15.

"For packages containing dangerous goods for which no danger label is prescribed in Table A of Chapter 3.2, mixed loading with substances and articles of Class 1 shall be prohibited."

4. Consequential amendment to RID 7.5.2.1:

The current second sentence becomes the third sentence.

Justification

5. There is no clear statement in RID/ADR 7.5.2.1 concerning mixed loading for packages containing dangerous goods for which no danger label is prescribed in Table A of Chapter 3.2. For safety reasons, there should be such a mixed loading prohibition for substance and articles of Class 1. At present, this only concerns UN Nos. 2211 and 3314 in Table A.