

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

Geneva, 17–27 September 2019

Item 5(b) of the provisional agenda:

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

Transport of FERTILIZER AMMONIATING SOLUTION (UN 1043)

Transmitted by the Government of Spain

Introduction

1. According to table A of Chapter 3.2 transport of UN 1043 FERTILIZER AMMONIATING SOLUTION with free ammonia is regulated only through SP 642, as columns 7-20¹ are empty. Special provision 642 is assigned only to this UN number, and reads as follows:

“Except as authorized under 1.1.4.2, this entry of the UN Model Regulations shall not be used for the carriage of fertilizer ammoniating solutions with free ammonia.”

2. Paragraph 1.1.4.2 allows carriage in a transport chain including maritime or air carriage according to the conditions stipulated for the maritime or air leg of the carriage.

3. The Model Regulations include for UN 1043 120 ml as LQ, E0 as EQ and P200 as packing instruction. IMDG Code include additionally SW2 for manipulation, and the TTH allow its transport in cargo airplanes using P200 with a 150 kg limit.

4. This means, that UN 1043, when in a transport chain including maritime or air transport, can be transported by rail or road using P200 or the LQ or EQ regulation.

5. Nevertheless, UN 1043 contains (ADR only) a classification code 4A in (3b), indicating that it is a dissolved gas. According to 2.2.2.2.2, dissolved gases which cannot be classified under UN numbers 1001, 2073 or 3318 shall not be accepted for transport. Therefore, UN 1043 could not be transported.

Analysis

Several different possibilities would exist to solve this issue:

a) Allowing transport under ADR/RID only when part of a transport chain including maritime or air carriage, either by:

- Modifying 2.2.2.2.2 to saying that dissolved gases which cannot be classified under UN numbers 1001, 2073 or 3318 shall not be accepted for transport, except as indicated under SP 642.
- Eliminating the classification code 4A for ADR from column (3b), creating the same situation as currently in RID. Nevertheless, even without the

¹ Column 15 includes “-” as transport category.

classification code 4A assigned, UN 1043 would still remain a dissolved gas, and 2.2.2.2.2 would still be applicable.

b) Not allowing any transport under ADR/RID, by eliminating SP642 and including into columns (4)-(20) "TRANSPORT PROHIBITED".

c) Allowing carriage of UN 1043 under the same conditions as in the Model Regulations, including 120 ml as LQ, E0 as EQ and P200 as packing instruction.

Proposal

Spain would like to hear the opinion of others on this issue and would be willing to prepare a proposal for next meeting according to the outcome of the discussions.
