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**Working Party on the Transport
of Dangerous Goods**

**Joint Meeting of the RID Safety Committee
and the Working Party on the Transport of
Dangerous Goods**
(Genève, 14-24 March 2000)

CLASS 8 : EXEMPTION OF 6 SUBSTANCES

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

SUMMARY

Analytical summary: Add a footnote in marginal 2800(3)(c) to exempt 6 substances from Class 8

Action to be taken: To amend Marginal 2800(3)(c)

Related documents: None.

Introduction:

Marginal 2800 states that any substance that causes full thickness destruction of human skin, or any substance which is judged not to cause full thickness of human skin, but has to be considered for its potential to cause corrosion to certain metal surfaces must be classified in Class 8. *In making this assessment, account should be taken of human experience in instances of accidental exposure.*

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The 6 substances listed below are solid products that can only be slightly corrosive to some metal surfaces in case of contact with water or air moisture.

Large volumes of these products (more than 100,000 tons annually) are transported in Europe.

The long experience acquired in transporting these products without referring to the ADR/RID regulations shows clearly the absence of any risk of causing other hazards by damaging or destroying other goods or means of transport.

Proposal:

To add the following footnote to Marginal 2800 (3) (c):

The products listed hereafter which do not cause full thickness destruction of human skin, and will generate a solution slightly corrosive to certain metal surfaces only if in contact with water or moisture contained in the air, are not products of Class 8:

Aluminium sulphate

Aluminium phosphate

Trisodium orthophosphate

Tripotassium orthophosphate

Tetrasodium diphosphate

Tetrapotassium diphosphate and crystalline hydrates of this substance.

Justification:

Safety

The substances in question would come into contact with water or moisture contained in the air only in the event of an accidental release. If such an accident occurs, the transport equipment will be cleaned long before any notable corrosion could take effect.

The experience acquired in transport of these products without referring to the ADR/RID regulations proves clearly the absence of risk of damaging or destroying other goods or means of transport.

Feasibility

No problem of feasibility. The proposed amendment is only a clarification of present practices.

Economic aspect

The proposal particularly affects the aluminium sulphate and phosphate industries, which produce more than one hundred thousand tonnes per year. For this sector of industry, the classification of these products in Class 8 would result in unnecessary additional cost detrimental to their competitiveness.

Enforceability

Monitoring compliance with the regulation would not pose any problems.
