



**OTIF/RID/CE/GTP/2020/14**

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Original: German

**RID:** 12<sup>th</sup> Session of the RID Committee of Experts' standing working group  
(Video-conference, 24 to 26 November 2020)

**Subject:** Temperature control for polymerizing substances

### Proposal transmitted by Germany

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#### Introduction

1. Substances requiring temperature control are not accepted for carriage by rail:

RID 2.2.41.2.3, 2<sup>nd</sup> paragraph:

"The following substances shall not be accepted for carriage by rail:

- ...;
- Self-reactive substances with an SADT  $\leq 55$  °C, therefore requiring temperature control:  
UN 3231 ....;
- Polymerizing substances requiring temperature control:  
UN 3533 POLYMERIZING SUBSTANCE, SOLID, TEMPERATURE CONTROLLED,  
N.O.S.;  
UN 3534 POLYMERIZING SUBSTANCE, LIQUID, TEMPERATURE CONTROLLED,  
N.O.S.T

2. Polymerizing substances can be stabilised either chemically or also by temperature control. However, RID is silent with regard to when temperature control is required for polymerizing substances.

For self-reactive substances though, the 2<sup>nd</sup> indent of the second paragraph of RID 2.2.41.2.3 refers to an "SADT  $\leq 55$  °C".

3. In RID, the classification criteria for polymerizing substances are set out in 2.2.41.1.20. In ADR and ADN, this text is supplemented by provisions concerning temperature control (cf. ADR/ADN 2.2.41.1.21). However, in view of the transport prohibition RID does not contain these rules.
4. The reference to the transport prohibition in 2.2.41.2.3 in the list of collective entries for UN numbers 3533 and 3534 is not sufficient, as no criterion is given here on whether or not temperature control is required. In cases of doubt, assignment to classification code PM1 (no temperature control required) could always be made.
5. It should be noted here that the transport prohibition applies not just to UN 3533 and UN 3534, but also to all polymerizing substances that are temperature controlled, i.e. also to temperature controlled substances that meet the criteria for polymerizing substances and, in addition, the criteria for inclusion in classes 1 to 8. Two options to help make the provisions clearer are proposed below.

### Proposal

#### Option 1:

6. In RID 2.2.41.2.3, replace the last indent by the following two indents (new text is underlined):
  - "– polymerizing substances in packagings or IBCs with an SAPT ≤ 50 °C and polymerizing substances in tanks with an SAPT ≤ 45 °C, therefore requiring temperature control:  
UN 3533 POLYMERIZING SUBSTANCE, SOLID, TEMPERATURE CONTROLLED,  
N.O.S.  
UN 3534 POLYMERIZING SUBSTANCE, LIQUID, TEMPERATURE CONTROLLED,  
N.O.S.
  - polymerizing substances of classes 1 to 8 in packagings or IBCs with an SAPT ≤ 50°C and polymerizing substances in tanks with an SAPT ≤ 45 °C, therefore requiring temperature control."

#### Option 2:

7. If necessary, the text could also be simplified and the two UN numbers listed (UN 3533 and UN 3534) could be omitted. In this case, the last indent of RID 2.2.41.2.3 could be worded as follows:
  - "– polymerizing substances in packagings or IBCs with an SAPT ≤ 50 °C and polymerizing substances in tanks with an SAPT ≤ 45 °C, therefore requiring temperature control."

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