RID: 48th Session of the Committee of Experts on the Transport of Dangerous Goods
(Berne, 19 and 20 May 2010)

Subject: Classification of environmentally hazardous substances

Comments from CEFIC on document OTIF/RID/CE/2010/8

1. Cefic appreciates the work of the secretariat in editorially revising the text of 2.2.9.1.10.5 that was adopted at the Joint Meeting in March 2010.

2. Cefic is proposing a further revision, mainly for reasons of user-friendliness by:
   - Making clear that the condition of lacking classification data applies to both cases;
   - Keeping a reference to the “old” Directives because this may help readers who are not so familiar with European user legislation, and because both Directives will be repealed with effect from 1 June 2015 only.
3. It is therefore proposed to replace the text of 2.2.9.1.10.5 by the following:

"2.2.9.1.10.5 Substances or mixtures classified as environmentally hazardous substances (aquatic environment) on the basis of Regulation 1272/2008/EC*

If data for classification according to the criteria of 2.2.9.1.10.3 and 2.2.9.1.10.4 are not available, a substance or mixture

- Shall be classified as environmentally hazardous substance (aquatic environment) if it has to be assigned category(ies) Aquatic Acute 1, Aquatic Chronic 1 or Aquatic Chronic 2 according to Regulation 1272/2008/EC* or, if still relevant according to the said Regulation, risk phrase(s) R50, R50/53 or R51/53 according to the Directives 67/548/EEC** or 1999/45/EC***;

- May be not classified as environmentally hazardous substance (aquatic pollutant) if it does not have to be assigned such a risk phrase or category according to the said Directives or Regulation.

