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

Geneva, 11-21 September 2007 Item 6 of the provisional agenda

PROPOSALS OF AMENDMENTS TO RID/ADR/ADN */

Marking and labelling of overpacks - sub-section 5.1.2.1

Transmitted by the Government of Belgium

Introduction

1. According to sub-section 5.1.2.1 (a), the word OVERPACK and the UN numbers and the labels for each item of dangerous goods contained in the overpack are not needed, if "the markings and the labels representative of all dangerous goods contained in the overpack" are visible.

2. Because of the additional marking provisions for goods of Classes 1, 2 and 7, given in sub-sections 5.2.1.5, 5.2.1.6 and 5.2.1.7, the "*markings representative of all dangerous goods contained in the overpack*" also include – amongst others – the proper shipping name for goods of Classes 1, 2 and 7 and the technical name for gases classified under an n.o.s. entry.

3. This can lead to illogical situations for overpacks containing goods of these classes : the UN numbers and the labels will have to be repeated on the overpack, even when those on the packagings are clearly visible from the outside, when one of the additional markings cannot be seen. The invisible additional marking, however, need not be indicated !

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4. There are two possibilities to remedy this unsatisfactory situation, depending on whether or not the visibility of the additional markings required in 5.2.1.5, 5.2.1.6 and 5.2.1.7 is deemed necessary in all circumstances.

Proposal

Alternative 1

5. If the visibility of the additional markings is deemed necessary, change 5.1.2.1 (a) (ii) as indicated :

"(ii) marked with the UN number preceded by the letters "UN", and be labelled as required for packages in 5.2 -2, for each item of dangerous goods contained in the overpack,".

Alternative 2

6. If the visibility of the additional markings is not deemed necessary, replace :

"unless the markings and the labels representative of all dangerous goods contained in the overpack are visible. If the same marking or the same label is required for different packages, it only needs to be applied once"

with :

"unless the <u>UN numbers</u> and the labels representative of all dangerous goods contained in the overpack are visible. If the same <u>UN number</u> or the same label is required for different packages, it only needs to be applied once".