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(Bern, 28 May – 1 June 2001)

PROPOSAL TO AMEND THE TEXT OF THE RID/ADR

Part 5 – Chapter 5.1, section 5.1.2
use of overpacks

Transmitted by the European Industrial Gases Association (EIGA)

SUMMARY

<i>Executive summary:</i>	This proposal aligns the requirements for the marking and labelling of overpacks with the corresponding requirement in the UN Recommendations and with current industry practice.
<i>Action to be taken:</i>	Modify 5.1.2.1 with the proposed text
<i>Relevant documents:</i>	TRANS/WP.15/159/Add.4.

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Introduction

In the present ADR/RID, the requirements for marking and labelling of overpacks are defined in marginal 2002(5)(a) and 9(1) respectively. It consists of affixing “*the identification number of the goods, preceded by the letters ‘UN’, and the labels of all the packages contained in the overpack, unless the identification numbers and the labels representing all the dangerous goods contained in the overpack are visible*”.

These requirements have been restructured in 5.1.2.1 as:

“An overpack shall be marked and labelled, as required for packages by Chapter 5.2, for each item of dangerous goods contained in the overpack, unless markings and labels representative of all dangerous goods contained in the overpack are visible. If a specific label is required for different packages, it only needs to be applied once.”

The new text means that all additional markings required in 5.2.1 for the packages of Class 1, 2 and 7 have to be affixed on the overpack. For Class 2 receptacles, it means that the date of the next periodic inspection and for those containing liquefied gases, that the mass of the product has to be affixed on the overpack.

EIGA doubts that was the intention when the text of the ADR/RID was restructured.

The UN Recommendations require the proper shipping name to be affixed on the overpack followed by the UN number. The Proper Shipping Name is subject to periodic changes (“inhibited” versus “stabilised”, “compressed” or not, etc). Many overpacks are “reusable” (see attachment) and have permanent markings and labelling. The affixing of the PSN would be an extra burden in case of modifications and would not add to the identification of the goods given by the UN numbers.

EIGA proposes to reword 5.1.2.1 in order to come back to the existing ADR/RID requirements.

Proposal

Modify 5.1.2.1 as follows:

“An overpack shall be marked with the UN number preceded by the letters UN and shall be labelled as required for packages in section 5.2.2, for each item of dangerous goods contained in the overpack, unless these markings and the labels representative of all dangerous goods contained in the overpack are visible. If a specific label is required for different packages, it only needs to be applied once. “

Justification

- Safety:* The existing level of safety will be maintained by aligning the text of 5.1.2.1 to the current requirements for marking and labelling of overpacks.
- Feasibility:* The proposal will align the restructured ADR/ADR with the UN Model Regulations and current industry practice.
- Enforceability:* Enforcement will rely upon checking that the required markings and labelling are affixed on the overpacks or that they are visible on the packages.



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