

## INLAND TRANSPORT COMMITTEE

Joint Meeting of the RID safety committee and the working party on the transport of dangerous goods  
(Bern, 20-23 March 2006)

## SMALL CONTAINERS

## Belgian comments to INF. 7

## Introduction

In INF 7, the secretariat of OTIF refers to the discussion during the 42<sup>nd</sup> session of the RID Committee of Experts of the first proposal contained in document OCTI/RID/CE/42/5h) submitted by Belgium. It was pointed out that the Joint Meeting should look at the issue of the different rules in RID/ADR concerning the labelling/markings of small containers, with the aim of achieving harmonisation.

The provisions of RID and ADR concerning the labelling/placarding of small containers differ as follows :

ADR	RID
-	5.2.2 For labelling purposes, small containers shall be considered as packages.
5.3.1.1.1/5.3.1.2 is applicable to all containers	5.3.1.1.1/5.3.1.2 is limited to large containers
5.3.1.7.3 For tanks with a capacity of not more than 3 m <sup>3</sup> <b>and for small containers</b> , placards may be replaced by labels conforming to 5.2.2.2	5.3.1.7.3 For tank-containers with a capacity of not more than 3 m <sup>3</sup> , placards may be replaced by labels conforming to 5.2.2.2

This results in :

- RID requiring only one label on small containers (the general rule for the labelling of packages), and
- ADR requiring 4 labels (replacing the placards).

## Proposal

Belgium proposes to align RID to ADR. If the joint meeting agrees to this, Belgium is willing to introduce a proposal to this intent at the next meeting of the RID Committee of Experts.

## Justification

The RID placarding leads to illogical situations :

- small containers bear one label, as packages do, but are marked with orange-coloured plates in the same way as large containers ;
- IBCs of more than 450 litres and large packagings have to bear two labels ; small containers of this size only need one.

Moreover, differences in the marking of small containers hamper multimodal transport.