

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the

Working Party on the Transport of Dangerous Goods

Bern, 22–26 March 2010

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Comments on doc. ECE/TRANS/WP.15/AC.1/2010/1 (Belgium)

Environmentally Hazardous substance mark on overpacks

Transmitted by the Government of Portugal

Introduction

1. As referred by Belgium “the marking of overpacks is dealt with in 5.1.2.1 which requires overpacks to be labelled as required for packages in 5.2.2”.
2. We agree that “the rules governing the marking with the environmentally hazardous substance mark are not to be found in 5.2.2, but in 5.2.1.8”. This means that in present situation it is not obligatory overpacks bear this mark as they should.
3. Like Belgium we are convinced that this exemption is not the result of a conscious decision of the Joint Meeting.
4. Belgium proposed a wording that goes in the right direction but we would like to propose a more precise wording, which emphasizes the distinction between UN marking and fish-tree symbol.

Proposal

Having in mind the text proposed by Belgium, our changes are as follows;

- “5.1.2.1 (a) An overpack shall be:
- (i) marked with the word “OVERPACK” ; and
 - (ii) marked with the UN number preceded by the letters “UN”, labelled as required for packages in 5.2.2 and marked with the environmentally hazardous substance mark as required for packages in 5.2.1.8, for each item of dangerous goods contained in the overpack, and if necessary marked with the environmentally hazardous substance mark as required for packages in 5.2.1.8;

unless the UN numbers, the labels and the environmentally hazardous substance mark representative of all the dangerous goods contained in the overpack are visible, except as required in 5.2.2.1.11. If the same UN number, the same label or the environmentally hazardous substance mark is required for different packages, it only needs to be applied once.

The marking of the word “OVERPACK”, which (...) concerned in the transport operation provide otherwise”.
