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Working Party on the Transport of Dangerous Goods

**Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods**
(Bern, 28 May-1 June 2001)

PACKAGES WITH LIMITED QUANTITIES CONTAINED IN OVERPACKS

Transmitted by the Government of Austria

Proposal

In chapter 3.4 add a new 3.4.7 with the following text:

"3.4.7. For overpacks the following provisions shall apply:

3.4.7.1 Overpacks containing packages conforming to 3.4.3, 3.4.4 or 3.4.5 shall be marked, as required by 3.4.4 (c) for each item of dangerous goods contained in the overpack, unless markings representative of all dangerous goods contained in the overpack are visible.

3.4.7.2 By derogation from 3.4.3 (a), 3.4.4 (c) and 3.4.5 (c) packages containing dangerous goods packed in limited quantities in accordance with 3.4.3 or 3.4.4 (a) and (b) or 3.4.5 (a) and (b) need not be marked when

(a) the packages are contained in overpacks of an individual capacity not exceeding 1.5 m³ and

(b) the overpacks are marked in the same manner as packages containing dangerous goods packed in limited quantities according to 3.4.4 (c)."

^{*}/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT/III/2001/1.
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Justification:

According to the introductory sentences in 3.4.3, 3.4.4 and 3.4.5 the provisions of other Chapters of ADR / RID (i.e. other than 3.4) do not apply. This means that 5.1.2 (use of overpacks) does not apply either. In practice there is, however, a need for the carriage of such packages in overpacks and such carriage takes place in considerable amounts despite the existing lack of clarity in particular with regard to the marking which should be required in the interest of safety. On the other hand, a consistent marking of all the packages creates considerable difficulties in particular in the context of road carriage for the purpose of retail traffic to small shops, because in the delivery from the intermediate storage various collections of individual packagings in minor numbers of pieces are assembled. The individual capacity of the usual overpacks containing such packages does not exceed 1.5 m³.

Similar reasoning as outlined above was behind the introduction of the ADR multilateral agreement M 104. Consequently a solution to this problem should now be prepared in the restructured ADR and RID.

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