ECONOMIC COMMISSION FOR EUROPE

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 42nd 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/marking 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:

<table>
<thead>
<tr>
<th>ADR</th>
<th>RID</th>
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<tr>
<td>-</td>
<td>5.2.2 For labelling purposes, small containers shall be considered as packages.</td>
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<tr>
<td>5.3.1.1.1/5.3.1.2 is applicable to all containers</td>
<td>5.3.1.1.1/5.3.1.2 is limited to large containers</td>
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<tr>
<td>5.3.1.7.3 For tanks with a capacity of not more than 3 m³ and for small containers, placards may be replaced by labels conforming to 5.2.2.2</td>
<td>5.3.1.7.3 For tank-containers with a capacity of not more than 3 m³, placards may be replaced by labels conforming to 5.2.2.2</td>
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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.