
ECONOMIC COMMISSION FOR EUROPE INLAND TRANSPORT COMMITTEE

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Geneva, 23-27 March 2009)
Agenda item 4

INTERPRETATION OF 5.2.1.8 (SPECIAL MARKINGS)

Transmitted by the Government of Portugal

1. Introduction

According to 5.2.1.8 packages containing environmentally hazardous substances meeting the criteria of 2.2.9.1.10 shall be marked with the marking of 5.2.1.8.3 (fish/tree symbol) with some exceptions of combination packaging containing inner packaging of 5 litres /5 kg of liquid/solid (which in principle do not represent any significant danger).

The Class 9 label (miscellaneous dangerous substances and articles) covers namely:

- Subdivision M6: pollutant to the aquatic environment, liquid; classified in UN3082: environmentally hazardous substance, liquid, n.o.s.
- Subdivision M7: pollutant to the aquatic environment, solid; classified in UN3077: environmentally hazardous substance, solid, n.o.s.

2. Problem:

An environmentally hazardous substance is a complex matter. These substances include:

- 1- Those classified in UN3077 and UN3082;
- 2- Other substances (among these, those substances which should have double marking/labelling).

According to 2.1.3.8, substances of classes 1 to 9, other than those assigned to UN numbers 3077 or 3082 meeting the criteria of 2.2.9.1.10 are additionally to their hazards of classes 1 to 9 considered to be environmentally hazardous substances (as such requiring fish-tree marking/label).

Basic elements for classification of environmentally hazardous substances (aquatic environment) are:

- Acute aquatic toxicity
- Potential for or actual bioaccumulation;
- Degradation (biotic or abiotic) for organic chemicals; and
- Chronic aquatic toxicity.

First question: What is precisely covered by environmentally hazardous substances in the sense of fish –tree symbol (5.2.1.8.3)?

Second question: Let's consider UN 1230 (methanol). This is an environmentally hazardous substance for aquatic media. However it is not considered under 2.2.9.10 and for that reason it seems not covered by 2.1.3.8.

Is this coherent with the importance of marking and labelling dangerous substances as methanol which in fact are very dangerous for environment?

3- Proposal:

To produce a list of entries from table A of chapter 3.2 in which we should considerer the obligatory use of "fish and tree symbol" from 5.2.1.8.3 (environmentally hazardous substances). This could help a lot people in the industry and by other hand it could avoid any misinterpretation which could lead to a lack of security.
