

OTIF



ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
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Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
(Geneva, 17 – 21 September 2012)

Agenda item 6: Proposals for amendments to RID/ADR/ADN

Comments from the International Union of Railways (UIC) on document ECE/TRANS/WP.15/AC.1/2012/22 transmitted by the European Council of the Paint, Printing Ink and Artists' Colours Industry (CEPE)

Introduction

1. In document ECE/TRANS/WP.15/AC.1/2012/22, CEPE suggests simplifying the information concerning environmentally hazardous substances and/or marine pollutants in the transport document and suggests developing a "symbol" which can be used as an alternative to the prescribed expressions "ENVIRONMENTALLY HAZARDOUS", "MARINE POLLUTANT" and "MARINE POLLUTANT/ENVIRONMENTALLY HAZARDOUS".
2. CEPE is of the opinion that "MP/EH" would be a suitable "symbol" to indicate the presence of environmentally hazardous substances and marine pollutants respectively in the transport document for all modes.
3. The UIC welcomes this approach in principle, but with a view to telematics applications and owing to the problems that exist in the transmission of information in international railway traffic, suggests dealing with the documentation of environmentally hazardous substances not by means of a symbol, but in the context of the information required in the transport document in accordance with 5.4.1.1.1.
4. To do this, it is suggested that the symbol for environmentally hazardous substances in 5.2.1.8.3 be assigned a "number", and that this number be shown in brackets (in last position) after the first number of the danger label model (main hazard) required in accordance with the 3rd indent of 5.4.1.1.1 (c).

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5. To maintain the system, the symbol shown in 5.2.1.8.3 should be described as model "9.1". The provisions concerning documentation in the 3rd indent of 5.4.1.1.1 (c) would have to be amended accordingly.
6. There is no need to assign the symbol model to substances in Table 3.2. The responsibilities concerning classification, marking etc. are not affected.

Suggestion to amend the provisions on the documentation for environmentally hazardous substances/marine pollutants

7. The symbol model in 5.2.1.8.3 should be numbered "9.1".
8. Add the following to the third indent of 5.4.1.1.1 (c):

"For substances that meet the classification criteria of 2.2.9.1.10 and for UN Nos. 3077 and 3082, the symbol model number 9.1 shall be given in brackets at the end after the applicable label model number(s)."
9. Consequential amendments:
 - Delete 5.4.1.1.18.
 - In the four page model of the instructions in writing in accordance with 5.4.3.4, assign "9.1" to the symbol for environmentally hazardous substances.
10. Examples of the suggested indication of environmentally hazardous substances in the transport document:

"UN 1203 PETROL, 3 (9.1), II";

"UN 2333 ALLYL ACETATE, 3 (6.1, 9.1), II";

"UN 3066 PAINT, 8 (9.1), III";

"UN 3469 PAINT, FLAMMABLE, CORROSIVE, 3 (8, 9.1), III".

Suggestion for next steps

11. If the Joint Meeting accepts the proposal in principle, it should first be submitted to the DSC and as it is of fundamental significance for all transport modes, it should then be discussed at the UN Sub-Committee of Experts. It is suggested that the opportunity also be taken to check the procedure for the other symbols required under dangerous goods law.

Justification

12. The proposed amendments would facilitate telematics applications across the modes (including the production of transport documents, identification of dangerous goods markings) and would simplify the provisions. In the context of their obligations in accordance with 1.4.2.2, it would also help carriers check that the prescribed markings were present on wagons, vehicles, load units etc.
