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, 18–22 March 2013
Item 5(b) of the provisional agenda

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

5.1.2.1 (b) (ii)

Transmitted by the Government of Germany\(^1,2\)

Summary

Executive summary: Review of 5.1.2.1 (b) (ii), marking of overpacks in accordance with the United Nations Model Regulations on the Transport of Dangerous Goods.

Action to be taken: Deletion of 5.1.2.1 (b) (ii).

Introduction

1. A comparison with the United Nations Model Regulations and the IMDG Code has revealed that they do not contain an additional rule as in RID/ADR/ADN under 5.1.2.1 (b) (ii).

2. The text of the provision in RID/ADR/ADN 5.1.2.1 (b) (ii) currently reads:
   "overpacks containing liquids in packages which need not be marked in accordance with 5.2.1.9.2, unless the closures remain visible."

\(^1\) In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

\(^2\) Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2013/1.
3. This provision is incomprehensible, as according to RID/ADR/ADN 5.2.1.9.2, orientation arrows are not required. Thus for these packages, it is not considered that there is a risk of the dangerous goods leaking, which would make it necessary to mark the packages with orientation arrows. Therefore, it is not necessary to mark overpacks.

4. Practical implementation of this provision is not guaranteed either, because as a rule, the position of the closures is not visible.

5. Furthermore, the text of RID/ADR/ADN 2013 makes clear the conditions in which it is not necessary to show orientation arrows on outer packagings:

"5.2.1.9.2 Orientation arrows are not required on:

(a) Outer packagings ...".

Proposal

6. Delete 5.1.2.1 (b) paragraph (ii) and delete the paragraph number "(i)" (not the text).