

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

12 August 2013

#### Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 17-27 September 2013

Item 5 of the provisional agenda

#### Interpretation of RID/ADR/ADN

### Use of the letter “W” in packaging codes

#### Submitted by the Government of France

#### Introduction

1. According to 6.1.2.4 of RID/ADR/ADN:

«The letters «T», «V» or «W» may follow the packaging code. [...] The letter «W» signifies that the packaging, although of the same type indicated by the code, is manufactured to a specification different to that in 6.1.4 and is considered equivalent under the requirements of 6.1.1.2.»

2. Sub-section 6.1.1.2 states that «in order to take into account progress in science and technology, there is no objection to the use of packagings having specifications different from those in 6.1.4, provided that they are equally effective, acceptable to the competent authority and able successfully to withstand the tests described in 6.1.1.3 and 6.1.5.».

3. France considers that if it is acceptable to modify the construction and testing requirements of packagings of 6.1.4, it is on the other hand not acceptable to deviate from the definition of a packaging type defined in 1.2.1.

#### Type of issue arising

4. For example we have recently encountered an issue concerning 24 plastic boxes, each one having its proper lid, assembled together on a base pallet, with a common lid, surrounded by a plastic film and two bracings. The manufacturer of this «packaging» asked to approve those 24 boxes as one single box with the code 4H2W «Solid plastics box», arguing that he had received such a certificate of approval in the past from other ADR Member States.

5. According to 1.2.1 a box is defined as follows:

«"Box" means a packaging with **complete rectangular or polygonal faces**, made of metal, wood, plywood, reconstituted wood, fibreboard, plastics or other suitable material. Small holes for purposes of ease of handling or opening or to meet classification requirements, are permitted as long as they do not compromise the integrity of the packaging during carriage;»

6. To our understanding in France, those 24 boxes put together on a pallet under a lid cannot be considered as a single solid plastics box, even with the plastics film and the

bracings, because this design type would be in contradiction to the definition of a box in 1.2.1 reproduced hereabove. Therefore we recommend that each box should be considered with its own lid as a rigid plastic box (code 4H2), whereas the pallet, the plastic film and the bracings should be considered as an overpack.

7. Apparently this interpretation is not shared amongst all Member States, since certificates have already been delivered in the past by other Member States for this group of 24 boxes, approving it as one single rigid plastics box with the code 4H2W.

### **Interpretation of the Joint Meeting**

8. This kind of issue is quite common and will continue to arise frequently, as those groups of packagings are often used in the automobile sector. Whatever the correct interpretation is, we would like to make sure every Member State has the same one, because this discrepancy can lead to put some companies in France at a disadvantage against their competitors in other Member States.

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