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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

Genève, 15 - 19 September 2014

Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN

Marking of the overpack with the mark “OVERPACK”

Transmitted by the Government of Spain^{1,2}

Summary

Executive summary: The question is raised whether the first paragraph of 5.1.2.1 (a) after (ii) applies to both letters (i) and (ii).

Introduction

1. 5.1.2.1 (a) of ADR/RID reads:
 - (a) An overpack shall be:
 - (i) marked with the word “OVERPACK”; and
 - (ii) marked with the UN number preceded by the letters “UN” as required for packages in 5.2.1.1 and 5.2.1.2, labelled as required for packages in 5.2.2 and marked with the environmentally hazardous substance mark if required for packages in 5.2.1.8, for each item of dangerous goods contained in the overpack;

¹ In accordance with the programme of work of the Inland Transport Committee for 2014–2015 (ECE/TRANS/240, para. 100, ECE/TRANS/2014/23, cluster 9, para.9.2).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2014/42.

unless the UN numbers, the labels and the environmentally hazardous substance mark representative of all dangerous goods contained in the overpack are visible, except as required in 5.2.2.1.11. If the same UN number, the same label or the environmentally hazardous substance mark is required for different packages, it only needs to be applied once.

The marking of the word “OVERPACK” shall be readily visible and legible, shall be in an official language of the country of origin and also, if that language is not English, French or German, in English, French or German, unless agreements, if any, concluded between the countries concerned in the transport operation provide otherwise.

Discussion

2. On one hand, the paragraph after (ii) (“unless the UN number...”) is indented at the same level as (i) and (ii) and therefore it could be thought that this paragraph applies both to (i) and (ii). On the other hand, the content of this paragraph explicitly only links to (ii), therefore it could be thought that it applies only to (ii).

Proposal

3. Spain would like to ask for an interpretation; does the paragraph after (ii) apply to both (i) and (ii), and it is therefore not necessary to mark the overpack with the mark “OVERPACK” if the UN number, labels and the environmentally hazardous substance mark are clearly visible?
