

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 5 (b) of the provisional agenda

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

17 August 2018

Proposal for amending 5.2.2.2.1.3 and 5.2.2.2.1.5 of RID/ADR/ADN

Transmitted by the Government of the Russian Federation

Introduction

1. As is known, the label in accordance with model No. 9A "Lithium batteries and cells" was first published in the 19th edition of the UN Model Regulations (2015) and then in the RID/ADR/ADN Regulations edition of 2017.

2. The emergence of a new label No. 9A was reflected in paragraphs 5.2.2.2.1.3 and 5.2.2.2.2. At the same time, the logic and structure of the presentation of the material in paragraph 5.2.2.2.1.3 was somewhat disturbed:

(a) In the second indent of paragraph 5.2.2.2.1.3 for an unknown reason, some incomplete, selective data on the content of the upper and lower halves of the symbol of model No. 9A are given, although completely and correctly this information is given in 5.2.2.2.2.

(b) In paragraph 5.2.2.2.1.3 twice decree an order of the class number 9 in the lower part of the label.

(c) In the third indent of paragraph 5.2.2.2.1.3 presents information on the possibility of placing an optional text such as the UN number or words describing the hazard (e.g. «flammable») in accordance with 5.2.2.2.1.5 provided the text does not obscure or detract from the other required label elements. Then the information the possibility of placing the optional text in a slightly different interpretation is repeated in paragraph 5.2.2.2.1.5.

3. Paragraph 5.2.2.2.1.5 states that «on labels other than those for material of Class 7, the optional insertion of any text (other than the class number) in the space bellow the symbol shall be confined to particulars indicating the nature of the risk and precautions to be taken in handling.».

4. In fact, the new model No. 9A falls entirely under the criteria of paragraph 5.2.2.2.1.5, that is, it has the upper and lower half of the symbol, which physically does not allow the optional text (UN number, type of hazard and precautions required for cargo handling).

Proposal

5. In order to avoid repeating the information in paragraphs 5.2.2.2.1.3 and 5.2.2.2.2 and the violation of the presentation of requirements in paragraphs 5.2.2.2.1.3 and 5.2.2.2.1.5, the text of paragraphs 5.2.2.2.1.3 and 5.2.2.2.1.5 is proposed to state in the following edition (deleted text, crossed out, the new text is highlighted in bold):

Paragraph 5.2.2.2.1.3 to state in the wording:

"5.2.2.2.1.3 With the exception of labels for divisions 1.4, 1.5 and 1.6 of Class 1, the upper half of the label shall contain the pictorial symbol and the lower half shall contain:

- (a) For Classes 1, 2, 3, 5.1, 5.2, 7, 8 and 9¹ class number;
- (b) For Classes 4.1, 4.2 and 4.3, the figure «4»;
- (c) For Classes 6.1 and 6.2, the figure «6».

~~In the sign on model No. 9A, in the upper half there should be 7 vertical stripes of the symbol, and in the lower half a group of symbol batteries should be depicted and the class number indicated.~~

~~Except for the danger label according to model No. 9A, the text in accordance with 5.2.2.2.1.5 can be text, for example, the UN number or words describing the type of hazard (e.g. "Poisonous"), provided that the text does not closes other required elements of the mark and does not distract them from attention~~

Paragraph 5.2.2.2.1.5 to state in the wording:

"5.2.2.2.1.5 On labels other than models No. **7A, 7B, 7C, 7E, 9A**, may include text such as the UN number or words describing the hazard (e.g. «Flammable») and precautions to be taken in handling. Provided the text does not obscure or detract from the other required label elements."

Justification

6. This amendment simplifies the correct interpretation of paragraphs 5.2.2.2.1.3 and 5.2.2.2.1.5, eliminates the existing errors and repetitions of information in paragraphs 5.2.2.2.1.3 and 5.2.2.2.2.

Difficulties

7. No difficulties with the application of the amendment are expected.

¹ *The symbol of the model No. 9A has the upper and lower halves (see 5.2.2.2.2).*