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**ECONOMIC COMMISSION FOR EUROPE  
INLAND TRANSPORT COMMITTEE**

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods  
(Geneva, 11-15 September 2006)  
Agenda item 5

**PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN**

Acceptance of labels according to the IMDG Code, ICAO-TI / IATA DGR

Transmitted by the European Chemical Industry Council (CEFIC)

**1. Background**

The provisions for labels (5.2.2.2) in RID/ADR are harmonised with the UN Model Regulations leading to identical label models.

The IMDG Code however, as well as the ICAO-TI / IATA DGR, despite following the same provisions of the UN Model Regulations, propose label models, which contain minor deviations from those in the UN Model Regulations (and thus from those in RID/ADR).

The main differences are:

- Class 4.1 label
  - Different width of the vertical stripes
  
- Class 8 label
  - UN and ADR/RID: White hand
  - IMDG Code: Shaded hand (“Errata and Corrigenda 1 November 2005” replaced the shaded hand with an unshaded (=white) hand, making it identical to the UN label. However the label with the shaded hand may continue to be used.)
  - ICAO-TI: “Black-dotted” hand
  - IATA DGR: Shaded hand
  
- Class 9 label
  - Different width of the vertical stripes
  - ICAO TI and IATA DGR have a horizontal line below the vertical stripes

Chemical companies have reported that, because of these differences, remarks have been made and fines imposed by competent authorities during checks in land transport.

UK introduced a proposal (ST/SG/AC10/C.3/2006/37) at the 29<sup>th</sup> meeting of UNSCETDG last July in order to deal in a general way with all possible deviations from the models in chapter 5.2 of the UN Model Regulations. Unfortunately there was no support for this proposal which was subsequently withdrawn.

In future efforts will be made to ensure that label models, identical to those in the UN Model Regulations, are being adopted in the IMDG Code, ICAO-TI and IATA-DGR in order to achieve full harmonisation between modes regarding label models.

2. Proposal

Until this harmonisation with the UN Model Regulations is achieved, Cefic is proposing to add a note to 5.2.2.2.1:

“Corresponding labels of the IMDG Code or ICAO Technical Instructions may also be used”.

If this would not be acceptable, Cefic is asking the Joint Meeting if there is a common understanding that IMDG Code, ICAO TI and IATA DGR labels may indeed be used for land transport, irrespective of whether the journey is part of a transport chain including maritime or air carriage.

3. Justification

In the electronic processing of orders, companies print labels, which preferably cover the information of all modes of transport as well as markings for use according to EU directives: this ensures a highly flexible system, independent from the subsequent transport mode used, which helps to reduce the quantity of stocks of different labels. In view of the minor deviations between the labels, this will not decrease the level of safety as there is no risk of misunderstanding the safety information, expressed by the label.

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