

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

Geneva, 12-16 September 2022

Item 5 (b) of the provisional agenda

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

7 September 2022

Comment on ECE/TRANS/WP.15/AC.1/2022/28 - Direct delivery of dangerous goods to end customers (overpacks)

Transmitted by the Council on Safe Transportation of Hazardous Articles (COSTHA)

Introduction

1. As mentioned in working document ECE/TRANS/WP.15/AC.1/2022/27 (COSTHA), the amount of dangerous goods transported directly to end consumers has increased in volume in recent years due to the COVID-19 pandemic. The current provisions of the regulations (RID/ADR/ADN) predominantly cover transportation between businesses, while the direct delivery to end consumer has historically been handled by parcel delivery companies, the postal services, and the consumer themselves. The regulations contain exceptions intended to limit the transport requirements for some of these types of shipments.
2. Illustrated below are a few different examples of bags and handling devices used by carriers that COSTHA believes should not be covered by the definition of an “overpack”.



