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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

**Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Twenty-first session, 1-10 July 2002
agenda item 10)

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO
THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS**

Chapter 5.1 – Marking of overpacks

Transmitted by the expert from the Netherlands

INTRODUCTION

In some circumstances the use of overpacks leads to problems with respect to the enforcement of regulations.

When the contents of a overpack are not visible from outside, e.g. by using a metal drum or wooden box as an overpack, enforcement bodies are confronted by seeing a “packaging” *with* indications of proper shipping name, UN number and danger label, but *without* UN markings as mentioned in 6.1.3, 6.5.2 or 6.6.3.

In many cases such “packagings” (without a UN mark) will not be recognised as overpacks by enforcement authorities. Whether the “packaging” is an *overpack* or a *package (which should bear a UN mark)* should be made more clear.

To increase the enforceability and avoid delay during transport it should be considered to identify the use of non-transparent overpacks during transport. The Netherlands think that a specific identification on the overpack itself is preferable to a general identification in the transport document.

PROPOSAL

The beginning of 5.1.2.1 will read as follows:

“An overpack shall be marked with the word “OVERPACK” and with the proper shipping name.....unless....”

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