



**Economic and Social  
Council**

Distr.  
GENERAL

TRANS/WP.15/AC.1/2002/34  
25 June 2002

Original: ENGLISH

---

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods  
(Geneva 9-13 September 2002)

Marking and labelling of overpacks

Transmitted by the European Chemical Industry Council (CEFIC) \*/

<b>Analytical Summary:</b>	<b>This proposal aims to remove the current requirement to mark an overpack with the different UN numbers of all dangerous goods contained inside the same overpack.</b>
<b>Action to be taken:</b>	Amend 5.1.2.1.1 to require the marking of the UN number only when the dangerous goods contained in the same overpack have the same UN number.

**1. Introduction**

Regarding the labelling and marking of overpacks RID/ADR 2003 requires

- 5.1.2.1.1 (a) An overpack shall be marked with the UN number preceded by the letters UN and shall be labelled as required for packages in 5.2.2, for each item of dangerous goods contained in the overpack, unless the markings and the labels representative of all dangerous goods contained in the overpack are visible. If the same marking or the same label is required for different packages, it only needs to be applied once.

- (b) Label conforming to model No. 11 illustrated in 5.2.2.2 shall be displayed on two opposite sides of the following overpacks
- overpacks containing packages which shall be labelled in accordance with 5.2.2.1.12, unless the labels remain visible, and
  - overpacks containing liquids in packages which need not be labelled in accordance with 5.2.2.1.12, unless the closures remain visible

Related to marking requirements only, this means that:

- there is no need for marking on the overpack in case the markings of all dangerous goods are visible (even if different UN numbers are involved)
- the overpack should be marked with the UN numbers of all the dangerous goods contained in the overpack, if the marking of each item of dangerous goods is not visible (even if only one UN number is involved)

If the same marking is required for different packages, it only needs to be applied once.

## **2. Proposal**

Amend 5.1.2.1.1 (a) to limit the requirement to mark the UN number on the overpack to cases when all dangerous goods contained in the overpack have the same UN number.

“An overpack shall be labelled as required for packages in 5.2.2, for each item of dangerous goods contained in the overpack, unless the labels representative of all dangerous goods contained in the overpack are visible. If the same label is required for different packages, it only needs to be applied once.

An overpack shall be marked with the UN number preceded by the letters UN when one item of dangerous goods is contained in the overpack, unless the UN marking of all dangerous goods is visible.”

Compared to the RID/ADR 2003 requirement, this would mean that there is no longer a need to mark the different UN numbers on the overpack, if the UN marking of not all dangerous goods contained in the overpack is visible. *This would not prohibit anyhow marking the overpack with the different UN numbers if this would be required by other regulations.*

## **3. Justification**

In the case of transport of dangerous goods with different UN numbers contained in the same overpack and of which the marking of each item of goods is not visible (e.g. the transport of samples for analysis or testing), the requirement to mark the overpack with all these different UN numbers does not really benefit safety and may even lead to confusion of emergency responders.

Moreover, the different danger labels will have been put on the overpack (as this requirement stays), and this information is sufficient in terms of safety information for the driver, the police or the fire brigades.

---