

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

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Item 6 of the provisional agenda

HARMONIZATION WITH THE UN MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS

Carriage of dangerous goods packed in limited quantities
Comments on ECE/TRANS/WP.15/AC.1/2009/28 and
request for additional transition period

Transmitted by the European Council of Paint, Printing Ink and Artists Colours
Industry (CEPE) and the International Association of the Soap, Detergent and
Maintenance Products Industry (AISE)

Background

CEPE and AISE strongly welcome the work done jointly by the UN Committee of Experts in the Transport of Dangerous Goods and the modal authorities to achieve harmonization of the requirements for the transport of dangerous goods in limited quantities. Such harmonization has been a priority for trade associations for many years.

We further welcome the detailed proposals by the Secretariat in ECE/TRANS/WP.15/AC.1/2009/28 for implementation into RID, ADR and ADN, and the recognition of the need for a transition period, set out in 3.4.20, to cover the differences in permitted sizes of inner packagings. This will assist industries in Europe only transporting by road, rail and inland waterway in the process of modifying their packaging to align with the smaller permitted sizes.

The principle change for products, other than those covered by 3.4.20, will be the introduction of the new diamond mark set out in 3.4.7. There will be significant stocks of limited quantities packages in the supply chain at the start of 2011 bearing the current diamond mark, incorporating the UN number(s). It will take some time for these stocks to reach their final destination. Industries and distributors will want to be able to minimize the need for over-labelling with the new diamond. On the other hand, we recognize that an extended period of the two systems of marking working

side-by-side would lead to confusion and negate the benefits of harmonization for which everyone has been striving.

A problem will also exist for industries transporting limited quantities internationally by sea from Europe during 2011, because of the differences in transition periods between RID/ADR/ADN and the IMDG Code.

Acknowledging that some over-labelling of existing stocks will still be necessary, we believe that a harmonized transition period of 12 months is a reasonable compromise for all modes. This would mean that mandatory implementation of the new diamond marking would be effected for all the surface modes from 1st January 2012.

Proposal

Include a new paragraph 1.6.1.x to read as follows:

“Packages containing dangerous goods in limited quantities marked fully in accordance with 3.4.4 (c) of RID/ADR/ADN as applicable on 31st December 2010 need not be re-marked in accordance with 3.4.7 until 1st January 2012.”

Add a note after 3.4.7 to read as follows:

“NOTE: see 1.6.1.x for information relating to the transition period for the implementation of the diamond marking in accordance with 3.4.7.”
