

**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

Bern, 8-11 September 2009 and  
Geneva, 14-18 September 2009  
Item 7 (b) of the provisional agenda

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

Environmentally hazardous substance mark on overpacks

Transmitted by the Government of Belgium

**Introduction**

The marking of overpacks is dealt with in 5.1.2.1 :

“5.1.2.1 (a) An overpack shall be :

- (i) marked with the word “OVERPACK” ; and
- (ii) marked with the UN number preceded by the letters “UN”, and labelled as required for packages in 5.2.2, for each item of dangerous goods contained in the overpack ;

unless the UN numbers and the labels representative of all dangerous goods contained in the overpack are visible, except as required in 5.2.2.1.11. If the same UN number or the same label is required for different packages, it only needs to be applied once.

The marking of the word “OVERPACK”, which shall be readily visible and legible, shall be in an official language of the country of origin and also, if that language is not English, French or German, in English, French or German, unless agreements, if any, concluded between the countries concerned in the transport operation provide otherwise.

- (b) Orientation arrows illustrated in 5.2.1.9 shall be displayed on two opposite sides of the following overpacks :
  - (i) overpacks containing packages which shall be marked in accordance with 5.2.1.9.1, unless the marking remains visible, and
  - (ii) overpacks containing liquids in packages which need not be marked in accordance with 5.2.1.9.2, unless the closures remain visible.”

The rules governing the marking with the environmentally hazardous substance mark are not to be found in 5.2.2, but in 5.2.1.8. This means that overpacks never have to bear this mark.

## Proposals

1. Belgium is not convinced that this exemption is the result of a conscious decision of the Joint Meeting and would like to have a clear point of view on this matter.
2. If the Joint Meeting would decide that overpacks are not systematically exempt from the marking with the environmentally hazardous substance mark, Belgium proposes the following change to 5.1.2.1 (a) :

“5.1.2.1 (a) An overpack shall be :

- (i) marked with the word “OVERPACK” ; and
- (ii) marked with the UN number preceded by the letters “UN”, labelled as required for packages in 5.2.2 **and marked with the environmentally hazardous substance mark as required for packages in 5.2.1.8.** for each item of dangerous goods contained in the overpack ;

unless the UN numbers, the labels **and the environmentally hazardous substance mark** representative of all dangerous goods contained in the overpack are visible, except as required in 5.2.2.1.11. If the same UN number, the same label **or the environmentally hazardous substance mark** is required for different packages, it only needs to be applied once.

The marking of the word “OVERPACK”, which shall be readily visible and legible, shall be in an official language of the country of origin and also, if that language is not English, French or German, in English, French or German, unless agreements, if any, concluded between the countries concerned in the transport operation provide otherwise.

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