

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

Transmitted by the European Aerosol Federation (FEA)

Background

Following the brief introduction of ECE/TRANS/WP.15/AC.1/2009/28 and Inf.42 on Friday afternoon FEA wants to come back to the issue of using the old and the new system in parallel or at least having a transitional period for the old packagings to avoid unnecessary re-marking of packagings on the market.

The old RID/ADR/ADN marking (UN number in a diamond or “LQ” in a diamond”) could be used until 30.06.2011. According to the 34th Amendment there could be shipments until the 31st of December 2011 with nearly the same marking (UN-number(s) in a diamond). These goods will be in warehouses down the supply chain and will be transported when the new requirements (new generic marking) are in force.

If the Joint Meeting would allow both systems (old and new) in parallel – FEA had the feeling that this was the original intention – paragraph 3.4.20.1 in document ECE/TRANS/WP.15/AC.1/2009/28 would need to be changed and some consequential changes as mentioned in Inf.42 need to be done. The figure in Note 2 of 3.4.20 would have to be adopted.

But if the Joint Meeting follows the secretariat’s proposal as it is currently written in 3.4.20.1 there is at least an urgent need in for a transitional period in chapter 1.6 for packagings, being in the distribution chain after the 30th of June 2011.

Proposals

Amend chapter 3.4.20.1 in ECE/TRANS/WP.15/AC.1/2009/28 that both systems could be used in parallel.

Adopt the figure in square brackets of Note 2 in 3.4.20.

Or, if the Joint Meeting decides not to allow both systems to be used in parallel for a limited time:

Insert a new transitional period in 1.6:

“1.6.XY Packagings manufactured, packed and marked in accordance with the requirements of the RID/ADR/ADN 2009 may be transported until the [30.06.2017]”
