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ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

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Working Party on the Transport of Dangerous Goods
(Geneva, 23 - 26 March 2009)

Item 6 of the agenda: Proposals for amendments to RID/ADR/ADN

Section 5.4.1: Dangerous goods transport document and information with reference to environmentally hazardous substances

Alternative presented by the UIC to the Swedish proposal ECE/TRANS/WP.15/AC.1/2009/4

1. In the above-mentioned proposal, Sweden suggests adding a new special provision 5.4.1.1.x stating that for substances meeting the classification criteria of 2.2.9.1.10 (except for UN numbers 3077 and 3082), the transport document shall bear the inscription "ENVIRONMENTALLY HAZARDOUS".
2. The justification given is that it makes it easier for the carrier to fulfil his inspection obligations pursuant to 1.4.2.2.1 f).
3. Given the increasing inclusion of new markings into the RID/ADR/ADN and the electronic data processing requirements, the UIC suggests implementing the goals of the Swedish proposal as follows:
 - include in 5.2.2.2.2 a new specimen hazard label "No. XX" that corresponds to the description in 5.2.1.8.3;

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- mark the corresponding UN numbers in Chapter 3.2, Table A, column (5) with this specimen hazard label "XX";
- delete the provisions in 5.2.1.8 and 5.3.6 (according to the provisions in 5.4.1.1.1 c), the specimen hazard label number "XX" would thus have to be indicated in brackets in the transport document for the substances in question).

Explanation and justification

4. The amendment suggested can easily be implemented in day-to-day operations and contributes to simplifying the provisions. Furthermore, it makes it easier for the carrier to use IT applications and to fulfil his inspection obligations pursuant to 1.4.2.2.1 f).
5. This amendment would have the further advantage of eliminating other inconsistencies (e.g. in the marking of means of containment, only the danger label according to 5.2.2 would be referred to, not the marking for environmentally hazardous substances in 5.2.1.8).

Safety implications

6. None.

Feasibility

7. No problems to be expected.

In fact, with a view to existing IT systems and future telecommunications applications, it should be examined whether further compulsory markings (e.g. the marking pursuant to 5.3.3 (elevated-temperature substances) and the warning marking pursuant to 5.5.2.3 (fumigated unit)) can also be assigned a specimen hazard label number.
