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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

Geneva, 17-21 September 2012

Item 5(b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Description of pollutants

Transmitted by the European Council of the Paint, Printing Ink and Artists' Colours Industry (CEPE)^{1, 2}

Introduction

1. In order to create some modal harmonisation between sea and land documents, the Joint Meeting adopted an amendment to 5.4.1.1.18 in March 2011, subject to the agreement of the International Maritime Organization (IMO) at the September 2011 Sub-Committee on Dangerous Goods, Solid cargoes and Containers (DSC) meeting of a similar change. IMO agreed that it was acceptable for the description "MARINE POLLUTANT" to be supplemented with "ENVIRONMENTALLY HAZARDOUS" aligning with the Joint Meeting's proposal. The revised wording was finally confirmed at the Joint Meeting the same month. This harmonised approach was welcomed by industry.

Discussion

2. However, as was pointed out in papers at the time to both the Joint Meeting and the DSC, the description "MARINE POLLUTANT/ENVIRONMENTALLY HAZARDOUS" is cumbersome and "ENVIRONMENTALLY HAZARDOUS" is not in accordance with

¹ In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2012/22.

the Globally Harmonized System of classification and labelling of chemicals (GHS). CEPE and the International Paint and Printing Ink Council (IPPIC) would have preferred a shorter generic description, as originally suggested to IMO by the Joint Meeting, but recognize the difficulties with finding suitable wording. Nevertheless, we believe that there is an opportunity to develop an appropriate “symbol” to be used as an alternative to “ENVIRONMENTALLY HAZARDOUS” or “MARINE POLLUTANT/ENVIRONMENTALLY HAZARDOUS”, which would be universally recognized and would reduce the space taken up on transport documents.

3. CEPE suggest that “MP/EH” would be an appropriate symbol. We welcome the views of the Joint Meeting on the suitability of such a symbol.

4. Currently there is no requirement in Chapter 5.4 of the UN Model Regulations for the supplementary description relating to pollutants to be added in transport documents. It is therefore necessary to make separate arrangements at all the modal meetings and these do not necessarily apply across the world. This can lead to problems under certain national jurisdictions. We believe that if a descriptive symbol can be adopted by DSC and the Joint Meeting in the first instance, it would be appropriate to ask the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods to include a similar measure for universal adoption. IPPIC/CEPE propose to present an informal document to the June 2012 meeting of the UNSCETDG, setting out our ideas and attaching a copy of this paper. A similar proposal will be sent to IMO DSC 17.

Proposal

5. Amend 5.4.1.1.18 to read as follows:

“5.4.1.1.18 Special provisions for carriage of environmentally hazardous substances (aquatic environment).

When a substance belonging to one of classes 1 to 9 meets the classification criteria of 2.2.9.1.10, the transport document shall bear the additional inscription “ENVIRONMENTALLY HAZARDOUS” or “MARINE POLLUTANT/ENVIRONMENTALLY HAZARDOUS” or “MP/EH”. This additional requirement does not apply to UN Nos. 3077 and 3082 or for the exceptions listed in 5.2.1.8.1. The inscription “MARINE POLLUTANT” (according to 5.4.1.4.3 of the IMDG Code) *or* “MP/EH” is acceptable for carriage in a transport chain including maritime carriage.”.

Justification

6. The option of a simplified description such as “MP/EH” will simplify matters for computer systems and will take up less space on transport documents.

Enforcement

7. No difficulties with enforcement are foreseen.
