

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

24 November 2014

Forty-sixth session

Geneva, 1-9 December 2014

Item 2 (e) of the provisional agenda

**Recommendations made by the Sub-Committee on its forty-third,
forty-fourth and forty-fifth sessions and pending issues: miscellaneous pending issues**

Comments on ST/SG/AC.10/C.3/2014/65 – Marking of the overpack with the mark “OVERPACK”

Transmitted by the expert from Sweden

1 Sweden fully supports the intention and the conclusions made by Spain in document ST/SG/AC.10/C.3/2014/65. We believe the proposed revised text for 5.1.2.1 under point 10 is clear and will facilitate interpretation of the provisions about marking of the overpack. To clarify that marks other than labels (e. g. environmentally hazardous substance mark) also have to be marked on the overpack, Sweden would like to propose a small amendment to the second indent under point 10 in 2014/65 concerning 5.1.2.1.

2. Sweden also supports the clarification of the text about overpack for dangerous goods packed in limited quantities in 3.4.11 under point 11 and for excepted quantities in 3.5.4.3 under point 12 in the Spanish proposal. To make the text even more clear and user-friendly, and also to facilitate translation of these provisions to different languages, we propose to amend the structure and wording of the texts under these points to make them more consistent with the text proposed for 5.1.2.1. To further align the text with section 5.1.2, new headings are proposed for 3.4.11 and 3.5.4.3.

Proposals

3. The expert from Sweden proposes the following editorial amendments to the proposals in document ST/SG/AC.10/C.3/2014/65 (new text is underlined, deleted text strikethrough. *Text in italics derives from the proposals in 2014/65*):

4. Amend 5.1.2.1 to read:

“Unless marks and labels representative of all dangerous goods in the overpack are visible, the overpack shall be:

- marked with the word “OVERPACK”. The lettering of the “OVERPACK” mark shall be at least 12 mm high; and
- labelled and marked with the proper shipping name, UN number and other marks, as required for packages by chapter 5.2, for each item of dangerous goods contained in the overpack.

Labelling of overpacks containing radioactive material shall be in accordance with 5.2.2.1.12.”

5. Amend 3.4.11 to read:

“3.4.11 Use of overpacks

[For an overpack containing dangerous goods in limited quantities, the following applies:]

Unless the marks representative of all dangerous goods in an overpack are visible,
~~When packages containing dangerous goods in limited quantities are placed in an overpack, the overpack shall be marked with:~~

- marked with the word “OVERPACK”. *The lettering of the “OVERPACK” mark shall be at least 12 mm high; and*
- marked with the marks required by this chapter.

~~unless the marks representative of all dangerous goods in the overpack are visible.~~

Except for air transport, the other provisions of 5.1.2.1 apply only if other dangerous goods which are not packed in limited quantities are contained in the overpack and only in relation to these other dangerous goods.“

6. Amend 3.5.4.3 to read:

“3.5.4.3 Use of overpacks

[For an overpack containing dangerous goods in excepted quantities, the following applies:]

Unless the marks representative of all dangerous goods in an overpack are visible,
~~the~~~~An overpack containing dangerous goods in excepted quantities shall be:~~

- ~~— Display the markings required by 3.5.4.1~~
- ~~Be~~ marked with the word “OVERPACK”. *The lettering of the “OVERPACK” mark shall be at least 12 mm high; and*
- marked with the marks required by this chapter.

~~unless the marks required by 3.5.4.1 within the overpack are visible.~~

[Except for air transport,] the other provisions of 5.1.2.1 apply only if other dangerous goods which are not packed in excepted quantities are contained in the overpack and only in relation to these other dangerous goods.“