

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 6 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:
miscellaneous proposals**

Comments on the document ECE/TRANS/WP.15/2015/3 with regard to the Special provision 664

Transmitted by the Government of Romania

Introduction

1. The Romanian delegation wishes to support the principle proposed by the Swiss delegation in their document ECE/TRANS/WP.15/2015/3.
2. The text of the Special provision 664 a) iii) refers to the packagings and the Swiss proposal intends to clarify the marking and labelling of packages. In this situation the text of the proposed *NOTE* should be clarified. The solution proposed by the Swiss delegation is used also in paragraph (d), but, in paragraph (g), the use of the same *NOTE*. However, it is not sufficient to clarify the provisions. paragraph g) refers to “Placarding and marking” for tanks, and the dispositions on labelling of packages are not included in this category.
3. In Proposal 1, we offer a possible solution for the text of the *NOTE* based on the Swiss text.
3. Another solution could be the insertion of a new paragraph (h) Marking and labelling [of packages] because the paragraph (g) refers to the tanks.
4. The problem which the Swiss delegation signalises arises from the long debated issues on “*placarding, labelling and marking*” which here clash in an unfortunate way. The separate regime applied to the *orange signalisation* of tanks in French should be clarified in the terminology used in paragraph g). The problem which can be easily anticipated is the fact that the “*marking*” which refers to two distinct notions in English, has in French different wordings: “*signalisation orange*” for tanks and “*marquage*” for packages.
5. Due to these principles, we hope Proposal 2, will be adopted even if it brings an extensive solution.

Proposal 1

6. Amend the proposed *NOTE*, which must be inserted under the text of paragraph (g), as follows:

«*NOTE: For packagings described in a) iii) above, the relevant provisions of Chapter 5.2 shall apply.*».

Proposal 2

7. Insert a new paragraph (h) as follows:

«(h) Marking and labelling [of packages]

For packagings described in a) iii) above, the relevant provisions of Chapter 5.2 shall apply.».

8. Consequential amendment if the text in the brackets is adopted: The title of the paragraph (g) may be amended as follows (new text is underlined):

«(g) Placarding or marking of tanks».
