

**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**

Geneva, 15–25 September 2015

Item 3 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN:**New proposals****Labels and markings****Communication from the Government of Switzerland^{1,2}***Summary*

Executive summary: Placards and orange-coloured plates which do not relate to the dangerous goods being carried must be removed from cargo transport units. A similar provision should be included for labels and markings affixed to packages.

Decision to be taken: Insert a new provision in Chapters 3.4, 3.5 and 5.2.

I. Introduction

1. Paragraphs 5.3.1.1.5 and 5.3.2.1.8 require the removal of placards and orange-coloured plates which do not relate to the dangerous goods being carried or residues thereof. In the event of an incident, these provisions make it possible to avoid unnecessary or inadequate response measures, which could waste precious time and prove costly. They also allow for the optimization of the transport chain by avoiding unnecessary operational measures such as leaving a protective distance in accordance with section 7.5.3 (RID) and prevent delays during inspections.

2. No similar provision exists for labels and markings on packages. However, the consequences are similar for those involved. In the event of an incident, the presence

¹ In accordance with the programme of work of the Inland Transport Committee for the period 2014–2015 (ECE/TRANS/240, para. 100, ECE/TRANS/2014/23, cluster 9, para. 9.2).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under document symbol OTIF/RID/RC/2015/43.



of unnecessary danger labels and markings on packages can lead to responses that are disproportionate or inadequate vis-à-vis the actual risk and generate additional costs. If there are inspections, the effort required to determine the contents of the packages and to review the related documentation causes delays which affect the whole transport chain. Unnecessary operations such as the placarding of cargo transport units and ensuring compliance with mixed loading requirements must be performed in such cases.

3. It is for these reasons that we deem it necessary to include a provision on the labelling and marking of packages, similar to that appearing in paragraphs 5.3.1.1.5 and 5.3.2.1.8, in Chapters 3.4, 3.5 and 5.2. We also believe that for dangerous goods packed in limited quantities, this new provision should not only apply to packages but also to the cargo transport units covered by the provisions of paragraphs 3.4.13 to 3.4.15.

4. The proposal below deals solely with packages containing dangerous goods. The case of packages that no longer contain dangerous goods but whose danger labels and markings have not been removed or covered is not dealt with here, despite the fact that it too can prove problematic. We believe, however, that the latter problem cannot be resolved in the context of RID/ADR/ADN. While RID/ADR paragraph 1.4.3.7.1 (f) requires the unloader to ensure that wagons and containers that have been completely unloaded, cleaned, degassed and decontaminated no longer bear placards or orange-coloured plates, unpacking activities fall outside the scope of RID/ADR/ADN.

II. Proposal

5. (a) Add a new paragraph 3.4.16 to read:

“3.4.16 Markings, labels, placards and orange-coloured plates which do not relate to the dangerous goods being carried, or residues thereof, shall be removed or covered.”.

(b) Add a new paragraph 3.5.4.4 to read:

“3.5.4.4 Markings and labels which do not relate to the dangerous goods being carried, or residues thereof, shall be removed or covered.”.

(c) Add the following sentence to the end of paragraph 5.2.1.2:

“Markings which do not relate to the dangerous goods being carried, or residues thereof, shall be removed or covered.”.

(d) Add a new paragraph 5.2.2.1.3 to read:

“5.2.2.1.3 Labels which do not relate to the dangerous goods being carried, or residues thereof, shall be removed or covered.”.