



## Economic and Social Council

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### 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, 19-29 September 2017

Item 5 (b) of the provisional agenda

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

### **Marking of cargo transport units carrying packages with goods of classes 1 to 9 (except UN numbers 3077 and 3082) with additional environmentally hazardous properties in small quantities in accordance with RID/ADR/ADN 5.2.1.8.1**

Transmitted by the Government of Germany\*, \*\*

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\* In accordance with the programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/2016/28/Add.1 (9.2)).

\*\* Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2017/30.

## Summary

- Executive summary:** At present, according to 5.3.6.1, it is not possible to dispense with the mark for environmentally hazardous substances for cargo transport units carrying packages with substances of classes 1 to 9 (except UN numbers 3077 and 3082) with additional environmentally hazardous properties in accordance with 2.2.9.1.10 in packages containing small quantities in accordance with 5.2.1.8.1. The packages themselves do not have to be marked accordingly. This is inconsistent with the provisions of the International Maritime Dangerous Goods (IMDG) Code.
- Action to be taken:** Amend the text in 5.3.6.1 to exempt cargo transport units carrying substances of classes 1 to 9 (except UN numbers 3077 and 3082) with additional environmentally hazardous properties in packages from the requirement to be marked if the criteria of 5.2.1.8.1 are met.

## Introduction

1. According to 5.2.1.8.1, packages with small quantities of environmentally hazardous substances that meet the criteria of 2.2.9.1.10 need not bear the mark for environmentally hazardous substances.
2. Germany is of the view that cargo transport units carrying packages with substances of classes 1 to 9 (except UN numbers 3077 and 3082) with additional environmentally hazardous properties should also not have to bear the mark for environmentally hazardous substances if the packages only contain small quantities in accordance with 5.2.1.8.1.
3. However, according to 5.3.6.1, there is currently no exception for such cases. 5.3.6.1 says:  
 “When a placard is required to be displayed in accordance with the provisions of 5.3.1, large containers/containers [...] containing environmentally hazardous substances meeting the criteria of 2.2.9.1.10 shall be marked with the environmentally hazardous substance mark shown in 5.2.1.8.3”.
4. However, with regard to the information to be entered in the transport document, 5.4.1.1.18 offers the possibility of an exception for the carriage of environmentally hazardous substances:  
 “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". **This additional requirement does not apply to UN Nos. 3077 and 3082 or for the exceptions listed in 5.2.1.8.1.**”
5. Germany would also point out that in this respect, there is also an inconsistency compared with the IMDG Code in terms of the marking requirements for cargo transport units. Cargo transport units containing marine pollutants in packages in small quantities in accordance with 2.10.2.7 of the IMDG Code (equivalent to RID/ADR/ADN 5.2.1.8.1) need not, according to 5.3.2.3.1, with reference to 2.10.2.7, bear the marine pollutant mark.

## **Proposal**

6. Germany therefore proposes to add the following text after the sentence in 5.3.6.1:  
“This does not apply to the exceptions listed in 5.2.1.8.1.”.

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