

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

15 March 2013

Bern, 18–22 March 2013

Item 5(b) of the provisional agenda

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

5.1.2.1 (b) (ii) – comments on document 2013/1

Transmitted by the Government of Denmark

Introduction

1. Denmark welcomes document 2013/1, because the reference to 5.2.1.9.2 in paragraph 5.1.2.1 (b) (ii) does not seem to make any sense.

2. The purpose of this informal document is to make the Joint Meeting aware of the fact that in RID/ADR 2005 there was a reference to the same provision (5.2.2.1.12), in both indents under 5.1.2.1 (b). It implied that marking with orientation arrows was required for overpacks containing e.g. single packagings with liquids.

ADR 2005:

5.1.2 Use of overpacks

5.1.2.1

...

(b) Label conforming to model No. 11 illustrated in 5.2.2.2 shall be displayed on two opposite sides of the following overpacks:

- overpacks containing packages which shall be labelled in accordance with 5.2.2.1.12, unless the labels remain visible, and*
- overpacks containing liquids in packages which need not be labelled in accordance with 5.2.2.1.12, unless the closures remain visible.*

5.2.2.1.12 Additional labelling

With the exception of Classes 1 and 7, label conforming to model No. 11 illustrated in 5.2.2.2 shall be displayed on two opposite sides of a package on the following packages:

- packages containing liquids in receptacles, the closures of which are not visible from the outside;*
- packages containing vented receptacles or vented receptacles without outer packaging;*
- and*
- packages containing refrigerated liquefied gases.*

3. In RID/ADR 2007, based on document TRANS/WP.15/AC.1/2005/42/Add.1, paragraph 5.2.1.9.2 was introduced and there was a structural change because orientation arrows were no longer considered a label, but a marking. The reference in 5.1.2.1 (b) (i) was maintained, but the reference in 5.1.2.1 (b) (ii) was changed to 5.2.1.9.2. Denmark would like to ask the Joint Meeting whether this last change in reference is to be considered a mistake or not.

4. If the reference to 5.2.1.9.2 is considered a mistake and if the Joint Meeting prefers to require marking with orientation arrows on overpacks containing single packagings with liquids, the Joint Meeting is invited to consider a proper solution. It should then be borne in mind, that because of the introduction of paragraph 5.2.1.9.2 it could probably not just be changing the reference in 5.1.2.1 (b) (ii) from 5.2.1.9.2 to 5.2.1.9.1.

5. If the Joint Meeting does not consider it necessary to require marking with orientation arrows on overpacks containing single packagings with liquids, Denmark will be prepared to support the proposal by Germany in document 2013/1.
