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Marking and labelling of overpacks

Transmitted by the European Chemical Industry Council (CEFIC) \*/

Analytical Summary:	The present requirement (5.1.2.1.1) to mark an overpack with the UN number of all dangerous goods contained induces an onuseful administrative burden when many dangerous goods are included in the same overpack as e.g. for the transport of samples and products in small quantities for analysis, testing or any other laboratory purpose.
Action to be taken:	Amend 5.1.2.1.1 to limit the need to carry the identification number only when one dangerous good is contained in the overpack.

**1. Introduction**

"5.1.2.1.1 is presently drafted as follow:

An overpack shall be marked with the UN number preceded by the letters UN and shall be labelled as required for packages in 5.2.2, for each item of dangerous goods contained in the overpack, unless the markings and the labels representative of all dangerous goods contained in the overpack are visible. If the same marking or the same label is required for different packages, it only need to be applied once."

\*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT/III/2002/9.

For the transport of different dangerous goods in the same overpack like e.g. the transport of samples for analysis or testing the requirement to mark the overpack with all the UN number contained induces onuseful administrative burdens without safety benefits.

The proper labelling of the overpack is indeed sufficient in term of safety information for the driver, the police or the fire brigades.

## **2. Proposal**

Amend 5.1.2.1.1 to require the marking of the UN number on the overpack only when one dangerous good is contained:

"An overpack shall be labelled as required for packages in 5.2.2, for each item of dangerous goods contained in the overpack, unless the labels representative of all dangerous goods contained in the overpack are visible. If the same label is required for different packages, it only need to be applied once. The overpack shall in addition be marked with the UN number preceded by the letters UN only when one dangerous good is contained in the overpack unless the UN number marking of the dangerous goods contained are visible."

## **3. Justification**

The marking of all UN numbers contained in the overpack is not mandatory, all the danger labels necessary as information in case of emergency being affixed on the overpack or visible.

The marking of all UN number on the overpack in case of heterogeneous load induces an administrative overload without safety benefits. The multiplication of UN number on the overpack may even be a source of confusion.

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