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**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods  
(Geneva, 13-23 September 2005)

**HARMONIZATION WITH THE UNITED NATIONS MODEL REGULATIONS ON  
THE TRANSPORT OF DANGEROUS GOODS**

**Orientation arrows (5.2.1.9) – Comments on TRANS/WP15/AC1/2005/42/Add.1**

**Transmitted by the European Industrial Gases Association (EIGA) \*/**

**SUMMARY**

***Executive summary:*** For safety reasons EIGA proposes to maintain the mandatory application of orientation arrows on closed cryogenic receptacles in RID/ADR rather than follow the 14<sup>th</sup> Revised edition of the UN Recommendations on the Transport of Dangerous Goods.

***Action to be taken:*** Revise the text of 5.2.1.9 which is proposed in TRANS/WP.15/AC1/2005/42/Add.1.

***Related documents:*** TRANS/WP.15/AC1/2005/42/Add.1 and TRANS/WP.15/AC1/2005/42.

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\*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2005/57.

## 1. Introduction

- 1.1. RID/ADR paragraph 6.2.1.3.3.4.4 and the UN 13<sup>th</sup> and 14<sup>th</sup> Revised editions paragraph 6.2.1.3.6.4.4 require that “All pressure relief device inlets shall under maximum filling conditions be situated in the vapour space of the closed cryogenic receptacle . . . .”
- 1.2. The only way that this can be guaranteed is for the receptacle to be kept upright in all circumstances. EIGA is of the opinion that the orientation arrows are an important safeguard for ensuring that this condition is maintained during carriage and use. Therefore their application should be mandatory.
- 1.3. EIGA is surprised that the UN requirements have been changed this way and will request that they are amended as proposed below at the December meeting of the UNSCETDG.

## 2. Proposal

Modify 5.2.1.9 as follows:

### 5.2.1.9 *Orientation arrows*

5.2.1.9.1 Except as provided in 5.2.1.9.2:

- combination packagings having inner packagings containing liquids;
- single packagings fitted with vents; and
- ~~open~~ cryogenic receptacles intended for the carriage of refrigerated liquefied gases,

shall be legibly marked with package orientation arrows which are similar to the illustration shown below or with those meeting the specifications of ISO 780:1985. The orientation arrows shall appear on two opposite vertical sides of the package with the arrows pointing in the correct upright direction. They shall be rectangular and of a size that is clearly visible commensurate with the size of the package. Depicting a rectangular border around the arrows is optional.

*(Diagram omitted)*

5.2.1.9.2 Orientation arrows are not required on packages containing:

- (a) pressure receptacles except for closed cryogenic receptacles;

*(rest unchanged).*

**3. Justification**

**3.1. *Safety implications:***

Safety is maintained if the error in the UN Model Regulations is not repeated in RID/ADR.

**3.2. *Feasibility:***

Status quo maintained.

**3.3. *Enforceability:***

Status quo maintained

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