



# Economic and Social Council

Distr.: General  
4 January 2012

Original: English

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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

Bern, 19–23 March 2012

Item 5(b) of the provisional agenda

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

## Marking and labelling of overpacks

Transmitted by the European Industrial Gases Association (EIGA)<sup>1,2</sup>

### Introduction

1. Whilst the majority of cylinders are not transported in overpacks, there are a small number of cylinders that do require to be transported using them. Overpacks are used to facilitate the safe handling and transport of small cylinders, whose water capacity typically is less than five litres.
2. A difficulty faced by EIGA members is the need to label an overpack with the UN number preceded by the letters “UN” for each product contained within the overpack. Overpacks are frequently used for a number of different products during their operational service. Overpacks are not only used to deliver, but also to collect cylinders from the customer. The driver is not always aware what cylinders are to be collected from a customer, and this may lead to issues when a collected cylinder is placed in an overpack, the overpack may not have the correct marks and labels on it.
3. To overcome the situation described in paragraph 2, it is proposed that overpacks for cylinders of up to five litres water capacity maybe labelled with additional danger labels that may not refer to what is actually contained within the overpack and the UN numbers preceded by the letters “UN” are omitted.

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<sup>1</sup> In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

<sup>2</sup> Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2012/11.

4. It is recognized that this will lead to declaring hazards in excess of what is contained within the overpack at any one time. This will ensure that the overpack is always labelled for the most dangerous combination of products that can be transported in the overpack. An example of such an overpack is shown at the end of this paper.

## Proposal

5. EIGA proposes that the requirements to mark and label an overpack carrying cylinders of less than five litres water capacity be modified.

6. Add the following new subparagraph (b) to 5.1.2.1 and renumber existing 5.1.2.1 (b) as 5.1.2.1 (c).

"(b) An overpack that is used for the transport of cylinders with a water capacity of five litres or less need not be marked with the UN number preceded with the letters "UN". Such overpacks may show labels relating to hazards not present in the actual contents of the overpack."

## Justification

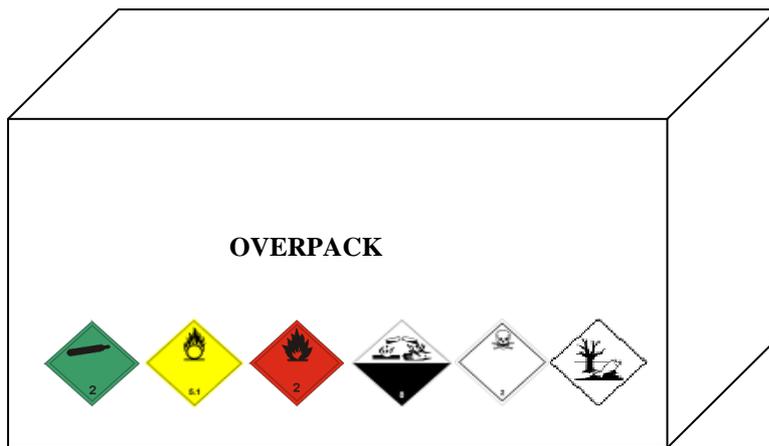
7. This ensures that emergency services are made aware of the most dangerous combination of products that could be carried in the overpack, and are able to take suitable actions.

8. The driver is able to transport small cylinders in safety, by using the overpack, and in full conformity with RID/ADR.

9. The hazard identification follows the same logic as used with the instructions in writing, where all possible hazards are mentioned on the document even for those transports not having products with those classifications.

## Enforcement

10. No difficulties with enforcement are foreseen.



Example of proposed overpack