



**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Forty-sixth session**

Geneva, 1–9 December 2014

Item 2 (e) of the provisional agenda

**Recommendations made by the Sub-Committee on its forty-third,
forty-fourth and forty-fifth sessions and pending issues: miscellaneous pending issues****Marking of the overpack with the mark “OVERPACK”****Transmitted by the expert from Spain¹***Summary***Executive summary:** The aim of this proposal is to clarify the text requiring to mark the overpack with the mark “OVERPACK”**Related documents:** Informal document INF.43 (45th session) (Spain)
ST/SG/AC.10/C.3/90, paragraph 108**Introduction**

1. At the forty-fifth session, the expert from Spain brought up an issue for interpretation concerning the marking of the overpacks with the mark “OVERPACK”.
2. 5.1.2 regulates the use of overpacks. The text of 5.1.2.1 is:
“An overpack shall be marked with the word “OVERPACK”, with the proper shipping name and the UN number and labelled, as required for packages by chapter 5.2, for each item of dangerous goods contained in the overpack unless markings and labels representative of all dangerous goods in the overpack are visible, except

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

as required in 5.2.2.1.12. The lettering of the “OVERPACK” marking shall be at least 12 mm high.”

3. The expert from Spain asked for an interpretation of this paragraph, specifically if the marks and labels representative of all dangerous goods in the overpack are visible, whether:

- (a) It was still necessary to mark the overpack with the word “OVERPACK”;
- (b) It was still necessary to mark the overpack with the word “OVERPACK” and the proper shipping name and the UN number; or
- (c) It was not necessary to mark the overpack.

4. No agreement could be reached, and in the report ST/SG/AC.10/C.3/90, paragraph 108, the following was retained on this subject:

“108. Most experts considered that it is not necessary to mark the word “OVERPACK” on an overpack when all marks such as the UN number and the proper shipping name and the labels on the packages contained are visible outside the overpack. However there was no consensus on this interpretation and the expert from Spain said that she would submit a document at the next session to clarify the meaning of 5.1.2.1.

5. Even if the present text seems not clear enough, and therefore different interpretations on its meaning can be made, most experts agreed on that it would be desirable not to require the mark with the word “OVERPACK” to be marked on the overpack when all marks, such as the UN number and the proper shipping name and the labels on the packages contained, are visible outside the overpack.

6. Therefore the expert from Spain proposes to amend the text of 5.1.2.1 to read as indicated in paragraph 10 below.

7. Also, the provisions related to overpacks for limited quantities and excepted quantities have been checked.

8. For limited quantities it is proposed to clarify the text as indicated in paragraph 11, by introducing hyphens which make clear to what the phrase “unless...” applies. Additionally, the requirement for the size of the lettering for the mark “OVERPACK” has been introduced.

9. For excepted quantities several changes to the text have been made (paragraph 12), in order to assure that overpacks are marked as such, introducing also the requirement for the lettering size. Also, it is proposed to introduce a sentence that makes clear that if dangerous goods in both excepted and non-excepted quantities are transported, the provisions in 5.1.2.1 apply only for those in non-excepted quantities, similar as with limited quantities. Finally, for excepted quantities it is said that the marks have to be “clearly visible”, while in the other cases they have to be just “visible”, and therefore it is proposed to delete the work “clearly”.

Proposal

10. Amend 5.1.2.1 to read:

“Unless markings and labels representative of all dangerous goods in the overpack are visible, the overpack shall be:

- Marked with the word “OVERPACK”. The lettering of the “OVERPACK” marking shall be at least 12 mm high;

- Marked with the proper shipping name and the UN number and labelled, as required for packages by chapter 5.2, for each item of dangerous goods contained in the overpack.

Labelling of overpacks containing radioactive material shall be in accordance with 5.2.2.1.12.”

11. Amend 3.4.11 to read:

“When packages containing dangerous goods in limited quantities are placed in an overpack, the overpack shall be marked with:

- The word “OVERPACK”. *The lettering of the “OVERPACK” mark shall be at least 12 mm high*
- the marks required by this chapter.

unless the marks representative of all dangerous goods in the overpack are visible.

Except for air transport, the other provisions of 5.1.2.1 apply only if other dangerous goods which are not packed in limited quantities are contained in the overpack and only in relation to these other dangerous goods.

12. Amend 3.5.4.3 to read:

An overpack containing dangerous goods in excepted quantities shall:

- Display the markings required by 3.5.4.1
- *Be marked with the word “OVERPACK”. The lettering of the “OVERPACK” mark shall be at least 12 mm high*

unless the markings required by 3.5.4.1 within the overpack are ~~clearly~~ visible.

[Except for air transport,] the other provisions of 5.1.2.1 apply only if other dangerous goods which are not packed in excepted quantities are contained in the overpack and only in relation to these other dangerous goods.