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## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

##### Ninety-seventh session

Geneva, 3 (P.M.) –7 November 2014

Item 4 of the provisional agenda

##### Interpretation of ADR

24 October 2014

### Interpretation of the special provision SP 664 (g) of ADR 2015

#### Transmitted by the Government of Luxembourg

We would like to know the opinion of the Working Party regarding the marking and labelling of the means of containment of additive devices.

The absence of a requirement regarding labelling and the marking of containments of additive devices may lead to misunderstanding and opens space for interpretation which may lead different practices by end-users and administrations among the contracting parties.

The present regulation focusses only on the labelling and placarding of the main substances carried in the tank (tank vehicle) or demountable tank and that this placarding and marking is not affected by the presence of the additive device or the additives contained herein.

Nothing is said about requirements of the labelling of the receptacles themselves-.

The current text of SP 664 (g) of ADR 2015 says:

...” (g) Placarding or marking

Placarding of the fixed tank (tank-vehicle) or demountable tank for the carriage of substances under this entry in accordance Chapter 5.3 is not affected by the presence of an additive device or the additives contained therein.”

On this basis two different interpretations are possible:

1. No written requirement in the provision means no marking / labeling of the containments of additives is needed at all.
2. Additive receptacles which are permanently fixed on the outside of the tank [SP664 (a) (ii)] and packages which are connected to the additive devices [SP664 (a) (iii)] shall be marked as packages in accordance with 5.2.2.

During the long discussion for the implementation of the new SP 664 in the tank working group the issue of the marking and labelling was part of the proposed text of SP 664. At autumn session 2013 of the Joint meeting it was decided to delete the proposed requirements for marking and labelling of the means of containment. (s. ECE/TRANS/WP.15/AC.1/132/Add.1, 8.)

We would like to know the opinion of the other delegations and to know whether these issues are addressed sufficiently clearly in the new current text of SP 664 of ADR 2015.

If the working group also sees a need of clarification a recommendation of the Working Party in the course of action is required until a final decision will be taken.