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Item 6 (b) of the provisional agenda

Proposals for amendments to annexes A and B of ADR:

Miscellaneous proposals

Labelling and marking of packagings connected to an additive device in accordance with special provision 664

Transmitted by the Government of Switzerland¹

Summary

Executive summary: To clarify the interpretation of the marking and labelling provisions of subparagraph (g) of special provision 664 in respect of additive devices, it should be specified that packagings that may be connected to an additive device are subject to the provisions for the marking and labelling of packagings.

Action to be taken: Add an explanatory NOTE to special provision 664, subparagraph (g).

Reference documents: INF.14, report ECE/TRANS/WP.15/226.

Introduction

1. At the last session, the interpretation of special provision 664, subparagraph (g) was raised by Luxembourg in informal document INF.14. Paragraph 15 of report

¹ In accordance with the programme of work of the Inland Transport Committee for 2014–2015 (ECE/TRANS/240, para. 100 and ECE/TRANS/2014/23, module 9, para. 9.1).



ECE/TRANS/WP.15/226 summarizes the Working Party's conclusions. However, that clarification does not appear in the text, and interpretation is still an issue for users. They do not know whether, when applying special provision 664, subparagraph (g), it is necessary to label packagings that may be connected to the additive device or, if that is the case, which type of labelling — placards or labels — should be used.

2. Substances that may be contained as additives (UN Nos. 1202, 1993 and 3082 and non-dangerous goods) in additive devices have the same danger labels as those concerned by special provision 664 (UN Nos. 1202, 1203, 1223, 1268, 1863 and 3475). Moreover, in line with 1.2.1, the additive devices are part of the service equipment of the tanks and their content is covered by the placards on the tanks of which they are part. Since the additives should bear the same danger labels and markings as the tank itself and they are an integral part of the tank, it was not considered necessary when drafting special provision 664 to replicate in a smaller label somewhere on the tank-vehicle the information already displayed in a large label on the tank itself. That is how special provision 664 (g) should be understood.

3. The packagings mentioned in subparagraph (a) (iii) of special provision 664, however, are subject to provisions other than construction requirements (e.g. labelling and marking) as they are not part of the additive device but rather are packagings in accordance with chapter 6.1. They are subject to other provisions of ADR and are simply attached to the additive device during discharge of the tank. They should bear the labels and marking required for packagings under chapters 5.2 and 6.1.

4. For purposes of clarification, this interpretation should be specified in special provision 664, subparagraph (g).

Proposal

Add the following Note after special provision 664, subparagraph (g):

“NOTE: For the packagings described in (a) (iii) above, the relevant provisions of ADR shall apply.”
