



**INF. 20**

10 November 2017

Original: English

**RID:** 8<sup>th</sup> Session of the RID Committee of Experts' standing working group  
(Utrecht, 20 to 24 November 2017)

**Subject:** Proposal to amend Part 5 of RID

**Proposal transmitted by the Russian Federation**

## Introduction

1. As is known, the label according to model No. 9A "Lithium batteries and elements" first appeared in the version of RID that came into force from 01.01.2017. The new label model No. 9A was referred to in particular in 5.2.2.2.2 and 5.2.2.2.1.3, which appears to be counter to the logic of the provisions in the last paragraph. So in 5.2.2.2.1.3, paragraph 2, for some unknown reason separate data concerning the upper and lower half of the symbol of label model No.9A are described, which are then duplicated in 5.2.2.2.2 and **twice** indicate the location of the **number of Class "9"** at the bottom of the danger label:


**"5.2.2.2.1.3** With the exception of labels for Divisions 1.4, 1.5 and 1.6 of Class 1, the upper half of the label shall contain the pictorial symbol and the lower half shall contain:

- (a) For Classes 1, 2, 3, 5.1, 5.2, 7, 8 and **9, the class number;**
- (b) For Classes 4.1, 4.2 and 4.3, the figure "4"
- (c) For Classes 6.1 and 6.2, the figure "6".

However for label model No 9A, the upper half of label shall only contain the seven vertical stripes of the symbol and the lower half shall contain the group of batteries of the symbol and class number.

Except for label model No 9A, the labels may include text such as the UN number or words describing the hazard (e.g. "flammable") in accordance with 5.2.2.2.1.5 provided the text does not obscure or detract from the other required label elements."

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5.2.2.2.2		<p>(No 9A)</p> <p>Symbol (seven vertical black stripes in upper half; battery group, one broken and emitting flame in lower half): black; Background: white; Figure "9" underlined in bottom corner</p>
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- The third paragraph of 5.2.2.2.1.3 also refers to the new label 9A. Here it is said that "Except for label model No 9A, the labels may include text such as the UN number or words describing the hazard (e.g. "flammable") in accordance with 5.2.2.2.1.5 provided the text does not obscure or detract from the other required label elements."
- As for 5.2.2.2.1.5, it states that "on labels other than those for material of Class 7, the optional insertion of any text (other than the Class number) in the space below the symbol shall be confined to particulars indicating the nature of the risk and precautions to be taken in handling". That is, in brackets we are talking about the labels of Class 7, having the upper and lower half of the symbol, which physically will not allow any optional text under the symbol (the type of hazard and precautionary measures that must be observed when handling the cargo, UN number):

**Class 7 hazard  
Radioactive material**



(No. 7A)  
Category I – WHITE  
Symbol (trefoil): black; Background: white; Text (mandatory): black in lower half of label:  
"RADIOACTIVE"  
"CONTENTS ..."  
"ACTIVITY ...";  
One red bar shall follow the word "RADIOACTIVE"; Figure "7" in bottom corner



(No. 7B)  
Category II - YELLOW  
Symbol (trefoil): black; Background: upper half yellow with white border, lower half white; Text (mandatory): black in lower half of label:  
"RADIOACTIVE"  
"CONTENTS ..."  
"ACTIVITY ...";  
In a black outlined box: "TRANSPORT INDEX"  
Two red vertical bars shall follow the word "RADIOACTIVE";



(No. 7C)  
Category III – YELLOW  
Symbol (trefoil): black; Background: upper half yellow with white border, lower half white; Text (mandatory): black in lower half of label:  
"RADIOACTIVE"  
"CONTENTS ..."  
"ACTIVITY ...";  
In a black outlined box: "TRANSPORT INDEX"  
Three red vertical bars shall follow the word "RADIOACTIVE";  
Figure "7" in bottom corner

- Thus, the new label 9A completely falls under the criteria of 5.2.2.2.1.5 - that is, it has the upper and lower half of the symbol, which physically will not allow any optional text to



be placed on it under the symbol (the type of hazard and precautions that are necessary to comply with the handling of goods, UN number).

## Proposal

5. In order to exclude the repetition of information in 5.2.2.2.1.3 and 5.2.2.2.2, and to avoid derogating from the structure of the presentation of requirements in 5.2.2.2.1.3 and 5.2.2.2.1.5, we propose that the text of paragraphs 5.2.2.2.1.3 and 5.2.2.2.1.5 be amended as follows:

**"5.2.2.2.1.3** With the exception of labels for Divisions 1.4, 1.5 and 1.6 of Class 1, the upper half of the label shall contain the pictorial symbol and the lower half shall contain:

- (a) For Classes 1, 2, 3, 5.1, 5.2, 7, 8 and 9, the class number;
- (b) For Classes 4.1, 4.2 and 4.3, the figure "4"
- (c) For Classes 6.1 and 6.2, the figure "6".

\* Symbol of label according to model No. 9A consists of the upper and lower halves (see 5.2.2.2.2).

~~However for label model No 9A, the upper half of label shall only contain the seven vertical stripes of the symbol and the lower half shall contain the group of batteries of the symbol and class number.~~

~~Except for label model No 9A, the Labels may include text such as the UN number or words describing the hazard (e.g. "flammable") in accordance with 5.2.2.2.1.5 provided the text does not obscure or detract from the other required label elements."~~

**"5.2.2.2.1.5** On labels other than those for material of Class 7 and label model No 9A, the optional insertion of any text (other than the Class number) in the space below the symbol shall be confined to particulars indicating the nature of the risk and precautions to be taken in handling."

## Justification

6. This amendment simplifies the correct interpretation of 5.2.2.2.1.3 and 5.2.2.2.2 and eliminates repetitive information in 5.2.2.2.1.3 and 5.2.2.2.2.

## Difficulties

7. No difficulties are expected in applying the amendment.