

OTIF



**ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBAHNVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-
NATIONAL CARRIAGE BY RAIL**

INF.5

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**RID: 48th Session of the Committee of Experts on the Transport of Dangerous Goods
(Berne, 19 and 20 May 2010)**

Subject: Comments on OTIF/RID/CE/2010/2 – RID 1.4.3.6 (b)

Proposal transmitted by the United Kingdom

Introduction

1. The United Kingdom thanks the OTIF Secretariat for producing its paper which aims to address the issues surrounding the interpretation of 1.4.3.6 (b) and the application of the text to the carriage of dangerous goods packed in limited quantities.
2. In proposal 2 of the Secretariat's paper, two options are presented for text relating to the application of 1.4.3.6 (b) to the carriage of dangerous goods packed in limited quantities. This will depend on whether the RID Committee of Experts concludes that information indicating the presence of dangerous goods packed in limited quantities is useful for the railway infrastructure manager or not.

Proposals

3. The United Kingdom strongly favours option 2. Information regarding the presence of limited quantities on the train has not been required before and the United Kingdom does not believe this causes a problem.
4. There was neither a specific proposal nor a conscious decision by the RID Committee of Experts to now require this information. The United Kingdom believes it was an unintended result of reformatting Chapter 3.4 in a way that now states what other provisions limited quantities are subject to in 3.4.1, rather than state that no other provisions of RID/ADR apply except what is specifically included in Chapter 3.4.

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5. However if there is majority support for some indication of the presence of limited quantities, the United Kingdom believes this should only be required when marking of the wagon or large container is required. If the consensus is for the approach in option 1, the United Kingdom proposes the following.
6. Amend the second indent of 1.4.3.6 (b) to read as follows (new text in **bold**):
 - “– UN numbers of the dangerous goods being carried in **each wagon or large container, or if only dangerous goods packed in limited quantities in accordance with Chapter 3.4 are being carried, information indicating their presence when marking of the wagon or large container in accordance with Chapter 3.4 is required.**”

Justification

7. 3.4.14 states that wagons or large containers containing dangerous goods packed in limited quantities need not be marked if there is no more than 8 tonnes per wagon or large container. This means it is difficult to know whether wagons or large containers are carrying limited quantities as there are no external markings identifying them.
 8. The proposal presented above specifies that information is only required for dangerous goods packed in limited quantities in excess of 8 tonnes per wagon or large container, as required under the provisions of the newly adopted 3.4.14. This is to link with the proposal made previously by the Belgian paper INF 8 and in the opinion of the United Kingdom, makes compliance with this provision achievable.
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