



**OTIF/RID/CE/GTP/2015/9**

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**RID:** 5<sup>th</sup> Session of the RID Committee of Experts' standing working group  
(Zagreb, 23 - 27 November 2015)

**Subject:** Carrier's checks of the marking of dangerous goods packed in limited quantities (Chapter 3.4 of RID)

**Proposal submitted by the International Union of Railways (UIC)**

## Introduction

1. RID 1.4.2.2.1 stipulates that the carrier which accepts the dangerous goods at the point of departure must perform certain checks. These checks are to be performed on the basis of the transport documents and accompanying documents and take the shape of a visual inspection of the wagon or container and, where appropriate, the load.
2. The carrier shall ascertain, for example, that the placards and markings prescribed for the wagon/container have been affixed by comparing the information provided in the transport documents (hazard number, UN number, hazard label number) with the markings on the wagon/container itself.
3. However, unlike for excepted quantities – which are categorised as much less safety-critical – no documentation rules apply to limited quantities. For excepted quantities, RID 3.5.6 states that the consignor must include the standard indication "DANGEROUS GOODS IN EXCEPTED QUANTITIES" and indicate the number of packages in one of the accompanying transport documents.
4. However, for limited quantities the consignor is not obliged to supply the carrier with standardised information on the dangerous goods. Rather, the consignor must merely inform the carrier, in traceable form, of the gross weight of the limited quantities being carried.

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5. Since no transport document informs the carrier of the details of the dangerous goods being carried in limited quantities, he does not know whether he needs to check the markings on the wagon/container. His task is further complicated by the fact that for limited quantities there is no documentation requirement in terms of acquiring this information and recording it in the carrier's IT system.
6. For this reason, UIC has not included checks on the correct marking of dangerous goods packed in limited quantities in UIC Leaflet 471-3 O, point 5 (10-point catalogue).
7. To enable/help the carrier to check whether dangerous goods in limited quantities are correctly marked, and to facilitate electronic record-keeping for such consignments, it is desirable that there also be a general marking requirement and a clear rule regarding documentation.
8. In that context, the general rules of RID 5.4.0 and the rules governing the format and language to be used of RID 5.4.1.4 should be applied.
9. Further, this opportunity should be taken to extend RID 1.4.2.2.1 to include the requirement to check the marking for limited quantities. Moreover, RID 1.4.3.6 (b) should foresee the systematic supply of information on limited quantities to infrastructure managers (not just upwards of 8 tonnes).
10. Should the proposal be adopted, UIC would also amend UIC Leaflet 471-3 O, point 5, i.e. it would also include the requirement to check the marking for limited quantities in accordance with Chapter 3.4.

## Proposal

11. The following amendments to RID are therefore proposed.

**3.4.1** Amend paragraph (e) to read as follows (added text is underlined):

"(e) Part 5, 5.1.2.1 (a) (i) and (b), 5.1.2.2, 5.1.2.3 and 5.2.1.9, 5.4.0, 5.4.1.4 and 5.4.2,".

**3.4.12** Amend to read as follows (amended wording is underlined):

**3.4.12** Consignors of dangerous goods packed in limited quantities shall provide the carrier with a transport document containing the following information:

"DANGEROUS GOODS IN LIMITED QUATITIES. TOTAL GROSS MASS X KG".

Loaders of dangerous goods packed in limited quantities shall observe the provisions of 3.4.13 to 3.4.15 concerning marking."

**3.4.14** Amend to read as follows:

**3.4.14** (deleted)".

## Consequential amendments

12. **1.4.2.2.1** In the context of the decisions according to informal document INF.48 of the RID/ADR/ADN Joint Meeting of 15-25 September 2015 in Geneva, paragraph (f) is amended to read as follows:

"(f) ascertain that the placards and marks prescribed for the wagons and containers in chapter 3.4 and 5.3 have been affixed;".

**1.4.3.6** Delete the following from the second indent of paragraph (b):

"when marking of the wagon or large container in accordance with Chapter 3.4 is required".

**Justification**

13. Uniform, straightforward documentation and systematic marking of dangerous goods packed in limited quantities facilitates the execution of carriage, harmonises processes, and enables all those participating in the transport chain (including emergency and rescue services) to unambiguously identify such consignments using both the markings and the transport document. Further, it significantly facilitates the use of electronic data processing systems and the application of the TAF TSI requirements, which also prescribe the provision of data on limited quantities.
14. Moreover, safety will benefit since in future the railway infrastructure manager will be informed of the dangerous goods in limited quantities present in the train in every instance – including where the total gross mass is below 8 tonnes – and can communicate this to emergency and rescue services.
15. For goods to be exported by sea, the interface with the maritime mode will also be facilitated, since subsequent marking will no longer be required.

**Feasibility**

16. The application of the rules will be simplified, since information on the presence of dangerous goods in limited quantities will in future be provided systematically via a statement in the transport document and a marking, irrespective of quantity limits.
  17. Step two could be to include these rules in ADR as well.
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