



Bulletin

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Organisation intergouvernementale pour les transports internationaux ferroviaires
Zwischenstaatliche Organisation für den internationalen Eisenbahnverkehr
Intergovernmental Organisation for International Carriage by Rail

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EDITORIAL

By the time this Bulletin reaches you, renovation work at OTIF's historic headquarters in Berne will be nearing completion. This marks a significant milestone, and this will be the last editorial before OTIF returns to its institutional home in Berne. Within a few months, the Secretariat and delegates will once again benefit not only from modern working conditions but also from the inspiration of Hans Erni's mural: a dynamic tribute to movement and international cooperation that invites us to raise our level of ambition.

Since January, two new Permanent Representatives have been nominated, reinforcing OTIF's capacity for swift and inclusive engagement with Member States. Their presence enhances the Organisation's responsiveness to global developments.

At the FIATA HQ Meeting 2025 in Geneva, freight-forwarding leaders explored how rail transport can play a stronger role in global supply chains. Live polls revealed a clear consensus: collaboration, flexibility, investment, and smart regulation are the essential levers to unlock the full potential of rail transport.

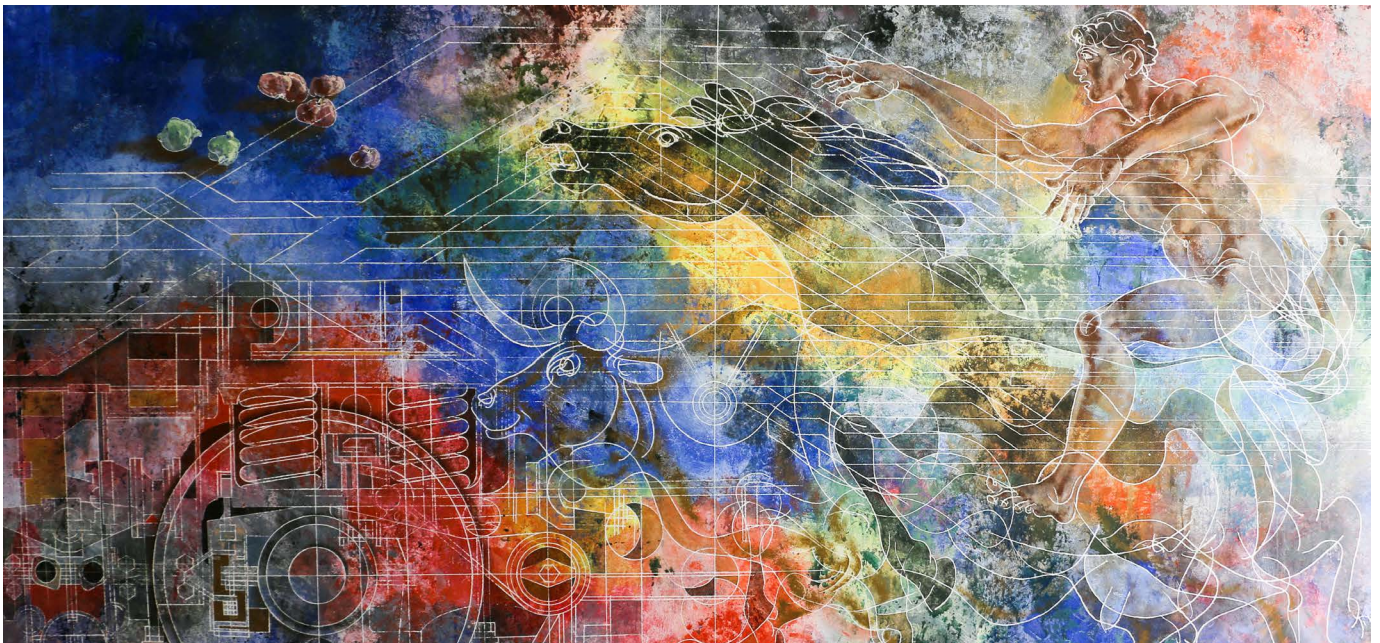
In April, the ad hoc Committee on Legal Affairs and International Cooperation adopted the most ambitious work programme to date, which covers the period from 2025 to 2027. This will guide developments across areas as diverse as passenger rights, infrastructure use, and the digitalisation of rail transport law. It reflects our shared determination to ensure that COTIF remains fit for the future.

Meanwhile, the RID/ADR/ADN Joint Meeting continues to serve as a vital forum for developing harmonised land transport regulations for the transport of dangerous goods. Progress in this area strengthens the highest standards and gives all actors, from governments to logistics operators, the tools to plan and transport dangerous goods safely and efficiently.

I would like to extend my sincere thanks to every Member State, partner organisation, expert, and member of the OTIF staff who contributes to our mission. Together, we are not only making international rail transport more efficient and safer today, but also shaping the future of international railway law and cooperation.

Aleksandr Kuzmenko

Secretary General



Hans Erni, mural, approximately 20m², 1965, entrance to the Secretariat

PERMANENT REPRESENTATIVE OF ARMENIA APPOINTED

On 12 February 2025, the Secretary General of the Intergovernmental Organisation for International Carriage by Rail (OTIF) received the nomination of H.E. Ms Hasmik Tolmajian as Permanent Representative of Armenia to OTIF.

The Secretary General of OTIF welcomed this appointment, which will enable continued cooperation between Armenia and OTIF. The presence of permanent representatives of Member States at the Organisation's headquarters makes working together quicker and more flexible.

Ms Tolmajian also has a wealth of experience. She joined her country's diplomatic service in 1995 and has held a number of positions within the Armenian Ministry of Foreign Affairs, including adviser to the minister. She has also served as Armenia's Ambassador Extraordinary and Plenipotentiary to the French Republic and to the Principality of Monaco.

The Secretary General of OTIF renews to Ms Tolmajian the assurances of his highest consideration.



source: www.armenpress.am

COURTESY VISIT: ALGERIA

H.E. Mr Mohamed Lamine Laabas, Algerian Ambassador to Switzerland, visited OTIF's temporary premises on 19 February 2025 for talks with Mr Aleksandr Kuzmenko, Secretary General of OTIF, who took up his duties on 1 January 2025.

The aim of this courtesy visit was to maintain the link between Algeria and the Organisation and to reaffirm Algeria's active involvement as a Member State within OTIF.

Algeria has been a member of OTIF's Administrative Committee since October 2024 and will be until September 2027.



PERMANENT REPRESENTATIVE OF THE REPUBLIC OF AZERBAIJAN APPOINTED

On 19 February 2025, the Secretary General of OTIF received the nomination of H.E. Mr Fuad Isgandarov as Permanent Representative of the Republic of Azerbaijan to OTIF.

The Secretary General of OTIF welcomed this appointment, which will enable continued cooperation between Azerbaijan and OTIF. The presence of permanent representatives of Member States at the Organisation's headquarters makes working together quicker and more flexible.

Mr Isgandarov also has extensive diplomatic experience. He is currently Azerbaijan's ambassador to Switzerland and Liechtenstein,

and has also served as ambassador to Belgium and the Netherlands.

The Secretary General of OTIF

renews to Mr Isgandarov the assurances of his highest consideration.



picture by: Caspian - Alpine Society

COURTESY VISIT: IRAQ

On 11 March 2025, Mr Mohamad Jawad Al Quraishi, Chargé d'Affaires of the Embassy of Iraq, visited Mr Aleksandr Kuzmenko, Secretary General of OTIF.

The aim of this courtesy visit was to maintain the link between Iraq and the Organisation and to discuss Iraq's future within OTIF.

Iraq has been a Member State since 1965. However, its membership was suspended in 1997 by decision of the General Assembly, under the regime of COTIF 1980. Following a request from Iraq, this suspension was agreed owing to the absence of international rail traffic caused by exceptional circumstances. However, in accordance with the decision of the General Assembly, this membership can be reinstated

by unilateral notification from Iraq as soon as international rail traffic resumes.

The Secretary General welcomed

this visit and thanks Mr Al Quraishi for the discussion.



FIATA'S HQ MEETING 2025 AND THE ROLE OF RAIL TRANSPORT IN INTERNATIONAL MULTIMODAL TRANSPORT

From 17 to 20 March 2025, the International Federation of Freight Forwarders Associations (FIATA) brought together just over 200 people for its HQ Meeting 2025. The Secretary General of OTIF, Mr Aleksandr Kuzmenko, was invited to take part as a speaker and moderator.

At the session on addressing major issues in multimodal transport logistics held on 17 March 2025, Mr Kuzmenko was joined by Mr Roel Janssens, Secretary of the UNECE Working Party on Transport Trends and Economics (WP.5), Ms Oriane Minger, Carbon Finance Manager at SCB, and Ms Bethanie Castelnovo, Chief Financial Officer at SCB.

Mr Kuzmenko also led a breakout session on the role of rail transport in international multimodal transport. He presented an overview of the system offered by the Convention concerning International Carriage by Rail (COTIF)

and then drew the audience's attention to the CIM Uniform Rules.

A live poll was then carried out, and three discussion groups were set up to deal with regulation, border crossings and the quality and financing of the railways.

This was followed by a second live poll on the challenges of integrating rail transport into international multimodal transport. The

responses led to the conclusion that collaboration, flexibility, investment, regulation and infrastructure, if properly implemented, could have a very positive impact on increasing rail transport's share of multimodal transport.

The Secretary General of OTIF was pleased to take part in this event and warmly thanks FIATA for its invitation.



NOTIFICATION OF PERMANENT REPRESENTATIVES

Since March 2025 ([Bulletin 1/2025](#))

NOT-25007	19.12.2024	Armenia Nomination of a Permanent Representative to OTIF
NOT-25008	21.2.2025	Azerbaijan Nomination of a Permanent Representative to OTIF

ACTIVE COOPERATION WITH FIATA

The Head of OTIF's Legal Department ad interim, Mr Steve Davey, took part in the HQ Meeting 2025 organised by the International Federation of Freight Forwarders Associations (FIATA) in Geneva from 17 to 20 March 2025. The following day, 21 March 2025, Mr Davey also attended a meeting of FIATA's Rail Working Group (WG Rail). The aim of the HQ Meeting was to examine the challenges facing the logistics and freight sector, and to discuss possible solutions. Over three days, the round tables and workshops focused on key	themes for OTIF, including questions about the major challenges for logistics in multimodal transport, the role of rail transport in international multimodal transport, issues relating to digitalisation, questions about the integrated approach to air freight logistics and, by analogy, to the rail system, and questions about consignment notes and bills of lading. Issues relating to digitalisation are particularly relevant to the work of OTIF's ad hoc Committee on Legal Affairs and International Cooperation. The WG Rail session then focused on specific issues concerning the	rail sector and discussed FIATA's responses to the consultation on the revision of COTIF organised by the OTIF Secretariat in the last quarter of 2024. In conclusion, taking part in these meetings has strengthened cooperation with FIATA and, more broadly, links with stakeholders in the sector, and has made it possible to promote international rail freight, COTIF and its appendices.
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REPORT OF THE 7th SESSION OF THE AD HOC COMMITTEE ON LEGAL AFFAIRS AND INTERNATIONAL COOPERATION

The ad hoc Committee on Legal Affairs and International Cooperation held its 7th session in Bern, Switzerland, from 8 to 10 April. The meeting was well attended by OTIF Member States, along with the European Union (represented by the European Commission) and observers from international associations, other international intergovernmental organisations and academia.

Setting up the bureau and Editorial Working Group

This was the first session of the ad hoc Committee since its mandate was renewed by the General Assembly in September 2024. The ad hoc Committee elected the United Kingdom, Norway and Germany as its Bureau until 31 December 2027. The Chair will rotate between the United Kingdom and Norway, with the United Kingdom acting as Chair until June 2026 and Norway acting as Chair from July 2026.

The ad hoc Committee also set up an editorial working group for the period until April 2028 composed of France, Germany and the United Kingdom. The Editorial Working Group's role is to review the decisions of the ad hoc Committee from the editorial point of view, particularly proposals to adopt or amend legal instruments, the aim of the editorial revisions being to ensure that the three OTIF working language versions (French, German and English) are of good quality and are consistent.

Adoption of the 2025-2027 Work Programme

Many live topics were discussed

in detail during the session. A key milestone was the adoption by the ad hoc Committee of its work programme for 2025-2027. This is the most ambitious work programme yet. It will guide and steer the work of the ad hoc Committee for the next three years and allow it to support the delivery of OTIF's long-term strategy.

The 2025-2027 Work Programme is divided into two sections: legal affairs and international cooperation. The structure of the legal affairs section reflects COTIF and its contractual appendices, focussing on COTIF itself and pervasive topics and then the detail on the carriage of passengers, carriage of goods, use of vehicles and use of infrastructure respectively. Many of the topics are included as a direct result of the responses received from respondents to the consultation on potential revisions to COTIF and its contractual appendices that closed in January 2025.

The second section of the 2025-2027 Work Programme is dedicated to international cooperation. It has been refocussed to align with the ad hoc Committee's objectives and to allow it to provide better support for the delivery of OTIF's long-term strategy.

The 2025-2027 Work Programme can be found [here](#).

A focus on high priority topics

A number of topics and themes in the 2025-2027 Work Programme have been identified as having high priority, two of which are digitalisation and vehicles.

Digitalisation

At its 7th session, in relation to the CIM Uniform Rules and the international carriage of goods by rail, the ad hoc Committee discussed the topic of digitalisation under the CIM Uniform Rules, considering the options for pursuing changes in this area. The ad hoc Committee instructed the Secretariat to prepare proposals to amend and update the provisions of the CIM Uniform Rules to provide fully and expressly for the use of electronic transport documents. In doing so, the ad hoc Committee asked that the following principles be respected:

- minimal intervention;
- non-discrimination of paper-based and paperless transport;
- technological neutrality;
- functional equivalence;
- compatibility with international electronic commerce law and transport law, in particular with the European Union legislation covering those matters;
- take into account current practices and solutions in the railway sector;
- give due respect to the autonomy of the parties involved in the carriage of goods.

This decision demonstrates the commitment of the ad hoc Committee to developing and evolving COTIF itself and its appendices to reflect and support modern practices in the sector.

Vehicles and the launch of a survey

Another high priority topic that was considered at the 7th session

and that is included in the 2025-2027 Work Programme is liability for loss or damage caused by a vehicle. It is clear that this is a topic of interest to Member States and to the sector. It formed part of a broader item at the session on wagon law, which also included the presentation of a paper on the movement of empty freight wagons.

As a result of the proposals and discussions at the session, it was decided that the Secretariat would launch a survey asking a series of specific questions on three of the topics included in the 2025-2027 Work Programme under this theme. The circular letter, which includes a link to the survey, can be found [here](#). Anyone with an interest in this topic is encouraged to respond to the survey by 17:00 on 5 September 2025.

Handbooks

At its 5th session, the ad hoc Committee considered the case for a handbook on COTIF. The aim of having a handbook on COTIF and its implementation and application by international associations is to outline the railway law established by COTIF and to show the different roles and responsibilities of international associations supporting the application of COTIF in the day-to-day business of international rail transport. A handbook should serve as a practical reference for OTIF Member States, states interested in acceding to COTIF and (importantly) their respective railway sectors.

The Handbook on the International Carriage of Goods by Rail (Contract Law and Operational Instruments and Tools) was published last year and can be found [here](#). At its 7th session, the Secretariat presented the working draft of OTIF's Handbook on the International Carriage of Passengers by Rail (Contract Law and Operational Instruments and Tools)

to sit alongside the first handbook. CIT, RNE and UIC supported the Secretariat in preparing the draft Handbook and CIT and RNE gave a joint presentation to the ad hoc Committee at the session on their work and input to this project. The Secretariat is grateful for all the support for this project.

The Handbook on International Carriage of Passengers by Rail will be finalised in the coming months and will be published on OTIF's website.

Copyright policy

It is important to ensure the legal protection of OTIF's name, abbreviation, logo and works and it is necessary to determine measures to this effect. With regard to the legal protection of OTIF's works specifically, at its 6th session, the ad hoc Committee approved the proposal for a decision on copyright and open access and the corresponding explanatory notes. Following the ad hoc Committee's proposals, the General Assembly adopted its decision on copyright and open access and the corresponding explanatory notes at its 16th session in September 2024.

According to Article 4 of that decision, the Secretary General is required to adopt an OTIF copyright and open access policy with the approval of the ad hoc Committee. The Secretariat prepared a draft copyright and open access policy, which was submitted to the ad hoc Committee at its 7th session for approval. The ad hoc Committee approved the copyright and open access policy.

Negotiable cargo documents

UNCITRAL was invited to give a presentation on its work on developing a convention on

negotiable cargo documents in order to update the ad hoc Committee since the matter was last considered at its 6th session in April 2024.

A uniform legal framework in the form of an international convention could provide for a consistent legal standard on the recognition and use of negotiable cargo documents, unlocking significant benefits. The proposed legal instrument aims to reconcile the various interests of freight forwarders, shippers, consignors and banks to provide an add-on for existing conventions that do not already have a negotiability and transferability function for their transport documents.

It was a timely update because the draft convention will be finalised and approved in July, with its adoption by the UN General Assembly due to take place before the end of the year.

The Secretariat would like to thank UNCITRAL for attending the session and presenting this project to the ad hoc Committee.

Next session

The Secretariat acknowledges and is grateful for the commitment and support shown by Member States, the European Commission and observers attending the 7th session.

The 8th session of the ad hoc Committee will be held from 2 – 4 December 2025 at OTIF's headquarters in Bern. Once again, it will be open to all Member States, the European Commission and observers. It will be the first ad hoc Committee session to be held in OTIF's office building following its renovation (which is planned to be completed in August 2025). To mark the occasion, participants will be invited to an informal networking reception at the end of the session.

Steve Davey

65th SESSION OF THE UN SUB-COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Geneva, 25 November to 3 December 2024

The 65th session of the UN Sub-Committee of Experts was the fourth and last session in the 2023/2024 biennium. The decisions of the UN Sub-Committee of Experts are incorporated into the 24th revised edition of the UN Model Regulations and form the common basis for all the mode-specific dangerous goods regulations. In the context of harmonising RID/ADR/ADN with the UN Recommendations on the Transport of Dangerous Goods, these decisions will later be carried over into the 2027 editions of RID, ADR and ADN.

The 65th session of the UN Sub-Committee of Experts was held from 25 November to 3 December 2024. It was chaired by Mr Duane Pfund (United States of America) and 23 states, 4 governmental organisations and 26 non-governmental organisations were represented at it. As all the decisions of the UN Sub-Committee of Experts have repercussions for the dangerous goods provisions of the various modes, the Intergovernmental Organisation for International Carriage by Rail (OTIF) was represented as a modal organisation.

Classification

Wearable airbag systems

Wearable airbag systems are active safety systems that are already used by motorcyclists, skiers and horse riders. These systems are available as waistcoats or jackets and offer comprehensive upper body protection that covers the chest, ribs, kidneys and the entire back. Depending on the model, the protection extends to the shoulders and/or hips.

It is anticipated that the use of such systems will be extended to other sporting activities such as speed skating, hockey, acrobatics, climbing and luge in the coming years. It is also very likely to be

used as personal protective equipment in various branches of industry.

Wearable airbag systems consist of cartridges containing a non-flammable gas under pressure (argon or helium), pyrotechnic substances required to activate the gas ejection, and a small lithium battery that supplies the system with power and activates the pyrotechnic substances when an accident situation is detected.

Currently, the entries UN 2990 Life-saving appliances, self-inflating and UN 3268 Safety devices, electrically initiated are used for the carriage of wearable airbag systems, to which special provisions 296, 280 and 289 are assigned. Special provisions 289 and 296 already allow exemption from the provisions if certain conditions are met.

The UN Sub-Committee of Experts decided to add self-inflating protective equipment to special provision 296. Special provision 280 was supplemented to say that the entry UN 3268 may also be used for safety devices transported for installation in life-saving appliances of UN 2990.

Liquid organic hydrogen carrier

Hydrogen will play an important role

in decarbonising energy systems. In addition to carrying hydrogen under high pressure as a gas or in refrigerated liquefied form, there is also the option of the hydrogen molecules being chemically bound to liquid organic carrier substances, so-called liquid organic hydrogen carriers (LOHC). One of the substances to which hydrogen can be chemically bound is benzyltoluene, which is assigned to the entry UN 3082 Environmentally hazardous substance, liquid, n.o.s. of Class 9. Up to 700 litres of hydrogen can be chemically bound in one litre of benzyltoluene.

Special reaction conditions are necessary to release the chemically bound hydrogen later. In the case of benzyltoluene, the chemical bonds are released with the help of a catalytic system at temperatures of 250°C. This means that the chemically bound hydrogen cannot be released under normal conditions of carriage, so this type of transport has major safety advantages compared with carriage under high pressure or in a refrigerated liquefied state. However, for safety during carriage, it must be noted that in the process of binding hydrogen to the hydrogen carrier (hydrogenation), traces of hydrogen in physically dissolved form, i.e. not chemically bound, can remain in the hydrogen carrier. These traces of hydrogen that are only physically dissolved

may potentially be released during transport.

Tests in Germany under extreme test conditions have shown that for benzyltoluene, there is only a very low risk of explosive atmospheres forming.

The UN Sub-Committee of Experts agreed to set a limit value for physically dissolved hydrogen (0.5 litres of hydrogen per kg of benzyltoluene) in a special provision assigned to UN number 3082. This limit value is considerably more conservative than the value specified in the criteria for substances which, in contact with water, emit flammable gases, which permits the development of one litre of flammable gas per kilogramme of the substance per hour.

In addition to benzyltoluene, other substances can be considered as liquid organic hydrogen carriers, e.g. toluene and methylcyclohexane, which are assigned to UN number 1294 and UN number 2296 respectively and are flammable liquids of Class 3. A comparable solution must be sought for these hydrogen carriers in the future.

Used medical devices containing lithium batteries

RID/ADR 2.2.62.1.5.9 contains exemption options for medical devices or equipment contaminated with or containing infectious substances. However, it does not contain any information on devices or equipment that contain lithium batteries or sodium ion batteries.

The UN Sub-Committee of Experts decided to specify in 2.2.62.1.5.9 that used medical devices containing lithium batteries or sodium ion batteries may also be exempted with regard to infectious substances under the conditions referred to. However, they must be assigned to UN numbers 3091,

3481 and 3552 for equipment containing lithium batteries or sodium ion batteries and carried under the conditions applicable to these UN numbers.

UN 2372 1,2-Di-(dimethylamino) ethane

UN 2372 1,2-Di-(dimethylamino) ethane is currently classified as a substance of Class 3, packing group II. Tests have shown that this substance has corrosive properties in addition to flammable properties and also meets the criteria for toxicity when inhaled.

Following various discussions at previous meetings, the UN Sub-Committee of Experts decided to retain the main hazard of flammability and to include the hazards of toxicity and corrosivity as subsidiary hazards. This change in classification leads to stricter conditions of carriage in some cases; in particular, a more “stringent” tank code is prescribed for carriage in portable tanks. As special provision for portable tanks TP 28, which permits the use of a minimum test pressure of 2.65 bar, is assigned in addition to the new tank code T 7, a transitional measure was not considered necessary.

UN 2862 Vanadium pentoxide, non-fused form

Vanadium pentoxide is used in the form of flakes in the steel and aviation industries. In powder form, it is used as a chemical catalyst in the production of sulphuric acid and in the manufacture of vanadium redox flow batteries.

UN 2862 Vanadium pentoxide, non-fused form is currently only assigned to packing group III. Based on an amendment to Annex VI of Regulation (EC) No 1272/2008 on the classification, labelling and packaging of

substances and mixtures as part of the 18th adaptation to technical and scientific developments, Germany considers that the substance should be assigned to packing group II because it is acutely toxic both when ingested and when inhaled. In an acute inhalation toxicity study in rats and mice, an LC₅₀ value was found which, according to RID/ADR 2.2.61.1.7, justifies classification in packing group II. The LC₅₀ value for acute inhalation toxicity is the concentration of vapour, mist or dust which, if inhaled continuously for one hour by young adult male and female albino rats, is most likely to cause the death of half the group of animals within 14 days.

In the discussion, the industry noted that the transport provisions should be based on data obtained under conditions that are representative of the substance consigned for transport. Concerns were expressed that test data obtained under artificial laboratory conditions, which do not reflect actual conditions of carriage, could lead to overly conservative and unnecessarily restrictive provisions. According to Germany, these concerns were taken into account, as packing group III may continue to be used for vanadium pentoxide containing less than 10% respirable particles. Packing group II only applies to vanadium pentoxide that contains at least 10% respirable particles.

The UN Sub-Committee of Experts decided to include a new entry for packing group II and to retain the existing entry for packing group III as there are no safety concerns in relation to carriage. A transitional measure allows the continued use of portable tanks of tank instruction T 1 for vanadium pentoxide of packing group II until the end of 2028.

UN 2941 Fluoroanilines

Fluoroanilines in liquid form are

currently assigned to Class 6.1, UN number 2941, packing group III. Fluoroanilines form a group of substances derived from both aniline and fluorobenzene. They are used as intermediates in the production of pharmaceuticals, herbicides and plant growth regulators, among other things.

Analysis shows that the vast majority of fluoroanilines do not meet the classification criteria of Class 6.1. In addition, some of these fluoroanilines have different or additional hazards that are not covered by UN number 2941.

The UN Sub-Committee of Experts agreed to a proposal from Germany to delete the collective entry for UN number 2941 and to mention the most frequently carried fluoroanilines by name in the alphabetical list with the UN number of the n.o.s. entry to be used (UN 1992 Flammable liquid, toxic, n.o.s., UN 2810 Toxic liquid, organic, n.o.s. and UN 3267 Corrosive liquid, basic, organic, n.o.s.). The UN Sub-Committee of Experts did not consider it necessary to include a transitional measure due to the change in tank codes resulting from the reclassification. As a result of the changed tank codes for RID/ADR tanks, the RID/ADR/ADN Joint Meeting must also examine whether a transitional measure might be necessary.

UN 3363 Dangerous goods in articles

The entry UN 3363 may only be used for articles, such as machinery, apparatus or devices, which contain dangerous goods as residues or as a component of the article. Articles carried under this entry may only contain dangerous goods authorised for carriage in accordance with the provisions of Chapter 3.4 (Limited Quantities), where column (7a) of Table A indicates the

quantity of goods permitted. As the value “0” is given for lithium batteries of UN numbers 3090 and 3480 and for sodium ion batteries of UN number 3551, carriage in limited quantities is not permitted. They may not therefore be a component of articles of UN number 3363.

Irrespective of this, special provision 188 allows an exemption from the provisions under certain conditions. One of these conditions is a limit value for the nominal energy of the cells or batteries.

A different concept applies to the relatively new UN numbers 3527 to 3548 for articles containing certain dangerous goods. The entry UN number 3363 may not be used for articles covered by these UN numbers. In contrast to UN number 3363, these articles may contain lithium batteries or sodium ion batteries in accordance with 2.1.5.2, provided they are a component of the article.

In special provision 301, which is assigned to UN number 3363, the UN Sub-Committee of Experts decided to include the possibility that these articles may contain lithium cells or batteries or sodium ion cells or batteries. However, these must meet certain conditions of special provision 188, such as limitation of the nominal energy, protection against damage and short circuits and affixing the battery mark. Packing instruction P 907 assigned to UN number 3363 mentions protection against damage and short circuits as well as the prevention of unintended activation.

UN 3536 Lithium batteries installed in cargo transport units

At its previous session, the UN Sub-Committee of Experts had decided to include the additional proper shipping name “Sodium-ion

batteries installed in cargo transport units” in the existing entry UN 3536, which is intended for portable energy storage devices containing lithium batteries. It was not considered necessary to include a new UN number, as the conditions of carriage for both energy storage systems are identical (see Bulletin 4/2024, p. 24).

The United States of America returned to this question and referred to an accident in which the emergency services on site had initially been unable to determine whether the cargo transport unit contained lithium metal or lithium ion batteries. This uncertainty had a negative impact on the emergency response.

To be able to inform the emergency services and those involved in the transport operation more precisely about the chemical composition of the batteries contained in the cargo transport units and, if necessary, to enable the assignment of special transport provisions, depending on the respective chemical composition of the batteries, the UN Sub-Committee of Experts accepted a proposal from the United States of America to split the existing entry for UN number 3536 into three separate UN numbers. Corresponding consequential amendments were made to the existing special provisions 360 and 388 and to the new special provision 410, which governs the classification of hybrid batteries.

Packagings

New definition of single packaging

RID/ADR/ADN contains, among other things, definitions of composite packagings, combination packagings, inner packagings, intermediate packagings and outer packagings. The term “single packaging”, which is used in numerous places in the regulations,

such as in the packing instructions, is not currently defined. The UN Sub-Committee of Experts adopted a new definition that defines single packagings as packagings that do not require inner packagings.

In this context, it was also noted that the term “outer packaging” is used in packing instructions P 130 and P 132a, although neither an inner packaging nor an intermediate packaging is required. It might be appropriate to use the term “single packaging” in these two places. This issue will be looked at again at a future meeting.

Packing group II metal packagings for organic peroxides and self-reactive substances

Under a high degree of confinement, organic peroxides and self-reactive substances may show violent decomposition effects. For this reason, according to packing instruction P 520, metal packagings are only allowed for Type E (packing method OP7) and Type F (packing method OP8) organic peroxides and self-reactive substances, because these types show less severe decomposition behaviour compared to types A, B, C and D. Nevertheless, organic peroxides and self-reactive substances of types E and F may show a more violent decomposition effect in metal packagings of packing group I than in metal packagings of packing group II. For safety reasons, the strength of metal packagings should therefore correspond to packing group II and not packing group I.

The UN Sub-Committee of Experts decided to include a sentence under the special provisions for the packing of organic peroxides and self-reactive substances in 4.1.7.1.1 that excludes the use of metal packagings that meet the criteria of the internal pressure

(hydraulic) test for packing group I. As this information is not part of the packing mark, a Note was added to this new provision stating that the consignor should contact the packaging manufacturer in this regard.

Environmentally hazardous paints

The transitional measure in RID/ADR/ADN 1.6.1.51 permits the carriage of water-based paints classified as environmentally hazardous liquids due to various preservative additives in quantities not exceeding 30 litres in non type-tested packagings until 30 June 2027.

Over the last 15 years, the paint industry has replaced solvent-based products with water-based products. An increasing number of paints and printing inks are being classified as environmentally hazardous substances due to the highly toxic components in the mixtures and the multiplication factors to be used for classification.

According to the industry, the plastics packagings currently used are not capable of passing the performance tests in 6.1.5. This applies in particular to the leakproofness test in accordance with 6.1.5.4 and the internal pressure (hydraulic) test in accordance with 6.1.5.5. In addition, plastics packagings with UN approval are no longer authorised for onward transport once the packaging has been opened and resealed for tinting, for example. The industry therefore proposed that a special packing provision should stipulate that plastics packagings with a maximum capacity of 30 litres do not have to meet the performance tests in Chapter 6.1.

In a lengthy discussion, various states questioned whether UN-approved packagings are not

available. There was also criticism that there would be a departure from the principle that classification results in the transport provisions.

The UN Sub-Committee of Experts finally agreed to limit application of the special packing provision until the end of 2034, to limit the maximum capacity to 20 litres, to require the stacking test in accordance with 6.1.5.6 to be passed and to apply the general provisions for the packing of dangerous goods in 4.1.1, except 4.1.1.3, and in 4.1.3.

UN 2029 Hydrazine, anhydrous

At the last but one meeting of the UN Sub-Committee of Experts, it was decided to assign a special packing provision to the entry UN 2029 Hydrazine, anhydrous, which requires packagings to be so constructed that explosion is not possible by reason of increased internal pressure. The use of cylinders, large cylinders and pressure drums for this substance was also prohibited (see Bulletin 2/2024, p. 14). The background to this decision was that tests at a Chinese university had shown that reactions such as explosion, deflagration and combustion can occur with different packaging configurations. The stronger the confinement, the more hazardous the reaction.

The United States of America returned to this question at this meeting and explained that anhydrous hydrazine has long been safely carried in stainless steel pressure receptacles filled with an inert gas, such as helium, to prevent decomposition. Prohibiting the use of pressure receptacles would result in the use of steel or plastics drums, which could increase the potential for contamination of hydrazine through reactions with the packaging material and/or atmospheric exposure. Owing

to its specialised application as a liquid propellant in satellite systems, probes and space launch vehicles, the supply chain for anhydrous hydrazine is strictly controlled.

The UN Sub-Committee of Experts decided to revise the decision taken at the 63rd session and to prescribe a new special packing provision for UN number 2029, which limits the pressure in pressure receptacles at 65°C to the test pressure. The selected temperature value of 65°C is already used in many places in the regulations. This eliminates the concerns originally expressed by China regarding excessive containment and ensures sufficient strength of the packaging for the transport of anhydrous hydrazine.

Acetylene cylinder marking

In the 2023 editions of RID and ADR, a provision was included in 6.2.2.7.3 that cylinders for UN 1001 acetylene, dissolved and UN 3374 acetylene, solvent-free must also be marked with the identity of the porous material and the total mass of the filled acetylene cylinder. In a transitional measure in 1.6.2.19, the option was included of only adding the marking to the cylinders at the first periodic inspection to be carried out after 1 July 2023.

After the new marking provisions came into force, the first periodic inspections of acetylene cylinders revealed that it was impossible to affix the newly prescribed marks to some types of cylinders. Owing to their design, a large number of such cylinders do not have the necessary space for these additional marks on the reinforced areas or on the steel plates. Marking on the cylinder shell is not permitted as this may damage the porous mass inside the cylinders.

The UN Sub-Committee of Experts decided to include a transitional measure that permits the continued use of acetylene cylinders for which

the additional marks of 6.2.2.7.3, which have been in force since 2023, cannot be applied to the cylinder shoulder or to a neck ring.

Marking of gas cartridges

6.2.2.8.1 stipulates that the marks on non-refillable cylinders must be permanently affixed. Except when stencilled, the marks must be on the shoulder, top end or neck of the cylinder shell or on a permanently affixed component of the cylinder (e.g. welded collar). A distinction is made between cylinders with a diameter greater than or equal to 140 mm and those with a diameter less than 140 mm. The application of this provision leads to difficulties with non-refillable cylinders with a diameter of 40 mm or less. These gas cartridges have a water capacity of less than 120 ml. Due to the size of the cylinders and the limited space available, the required minimum sizes lead to poor legibility of the required marks and hence the potential loss of important safety information.

It is estimated that several hundred million of these non-refillable cylinders are manufactured every year, which are mainly used in food, medical and safety applications.

The UN Sub-Committee of Experts recognised these difficulties and decided to permit marking on the cylindrical part of the gas cartridge. The minimum size of the marks may be reduced from 2.5 mm to 1.5 mm and the minimum size of the UN packaging symbol and the “DO NOT REFILL” mark may be reduced from 5 mm to 3 mm.

Use of recycled plastics material for flexible IBCs

In the 2025 edition of RID/ADR, the possibilities for the use of recycled plastics material in the manufacture of packaging and IBCs for the transport of dangerous goods were

significantly expanded. However, little consideration has so far been given to flexible IBCs whose packaging body consists of a film, woven material or other flexible material.

The design of the flexible IBC and the quality of the seams are decisive for the strength and quality of a flexible IBC. As flexible IBCs may only be used for solid dangerous substances, factors that are important for the carriage of liquid substances, such as permeation, which can have a negative effect on strength and quality, only play a minor role.

As flexible IBCs must satisfy the test requirements of 6.5.6, it is assumed that the use of recycled plastics material has no negative impact on safety.

In line with a proposal from Belgium, the UN Sub-Committee of Experts amended 6.5.5.2.2 and 6.5.5.2.8 in order to authorise the use of recycled plastics material. As both paragraphs contain provisions for packaging bodies, it was decided to summarise these provisions in 6.5.5.2.2.

Periodic testing of IBCs

In accordance with 6.5.4.4.2, every metal, rigid plastics and composite IBC for solids which are filled or discharged under pressure, or for liquids, shall undergo a suitable leakproofness test before it is first used for carriage and thereafter at intervals of not more than two and a half years. As 6.5.4.4.2 also states that this test is part of a quality assurance programme as stipulated in 6.5.4.1 and that statistical sampling is part of a quality assurance programme, the question has already arisen in the past as to whether statistical sampling should also be carried out during the initial test and the periodic tests.

While statistical sampling is easily

possible for the initial test before first use, statistical sampling is less easy for the periodic test, as different types of construction are tested during the leakproofness test as part of the periodic test and the behaviour of one type of construction does not allow any conclusions to be drawn about the behaviour of other types of construction.

In addition, a leakproofness test for composite IBCs with a plastics inner receptacle at the level of the design type test, i.e. excess pressure of at least 20 kPa (0.2 bar) for a period of 10 minutes, can lead to permanent deformation of the outer casing and the inner receptacle.

According to 4.1.1.15, the permitted period of use of rigid plastics IBCs and plastics inner receptacles of composite IBCs is five years, so no more than one periodic test is carried out during the lifetime of these IBCs.

The discussion at the UN Sub-Committee of Experts showed that random sampling as part of the periodic test is not practicable. In many states, the design type test level is not required for the leakproofness test as part of the periodic test/inspection. The UN Sub-Committee of Experts decided to clarify in a Note that the test level of the leakproofness test as part of the initial and periodic test does not necessarily have to comply with the design type test. However, IBC samples taken from production must comply with the provisions of 6.5.6.7 for the leakproofness test.

Packagings that may not be used for substances which are liable to become liquid during carriage

4.1.3.4 lists the packagings that may not be used for substances that are liable to become liquid during carriage. However, packing instructions P 002 and P 410 list other packagings that are not mentioned in 4.1.3.4. These are, for example, drums or jerricans made of steel, aluminium or another metal with removable lids and plastics drums or jerricans with removable lids which may not be used for substances of packing group I that are liable to become liquid during carriage.

The UN Sub-Committee of Experts decided to align 4.1.3.4 with packing instructions P 002 and P 410 in order to remove any doubt. An additional provision in the two packing instructions will then refer to 4.1.3.4.

Portable tanks

Connections in the vapour phase of portable tanks

According to 6.7.4.5.2, each filling and discharge opening in portable tanks used for the carriage of flammable refrigerated liquefied gases must be fitted with at least three mutually independent shut-off devices in series. The shut-off device closest to the jacket must be a quick closing device that must also be possible to operate by remote control. Substantially similar provisions are also set

out in 6.8.3.2.3 and 6.8.3.2.7 for RID/ADR tanks.

In the 2023 edition of RID/ADR, a provision was included in special provision for tank equipment TE 26, which specifies that all filling and discharge connections, including those in the vapour phase, of tanks intended for the carriage of flammable refrigerated liquefied gases must be equipped with an instant closing automatic stop-valve as close as possible to the tank.

The UN Sub-Committee of Experts adopted a proposal from Germany to specify in 6.7.4.5.2, in line with the provision for RID/ADR tanks, that filling and discharge openings also include the openings in the vapour phase that are used for vapour recovery. As various states considered that this clarification tightened the regulations, a transitional measure was also adopted which allows the continued use of existing portable tanks.

Next session

The 66th session of the UN Sub-Committee of Experts will be held in Geneva from 30 June to 4 July 2025. At this first session of the 2025/2026 biennium, work will begin on the 25th revised edition of the UN Model Regulations, which will later be incorporated into the 2029 editions of RID, ADR and ADN.

Jochen Conrad

RID/ADR/ADN JOINT MEETING

Berne, 24 to 28 March 2025

The Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods of the United Nations Economic Commission for Europe (RID/ADR/ADN Joint Meeting) in March 2025 was the third meeting of the 2024/2025 biennium. The discussions centred on amendments to the 2027 editions of the Regulation concerning the International Carriage of Dangerous Goods by Rail (RID), the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) and the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN).

The RID/ADR/ADN Joint Meeting was held in Berne from 24 to 28 March 2025.

Delegates from 24 Member States of the UNECE and OTIF, the European Union, represented by the European Commission and the European Union Agency for Railways, and from 17 non-governmental organisations took part in the discussions. Zimbabwe was also represented in an advisory capacity.

Tanks

The documents on tank issues were dealt with by the working group on tanks, which had already held two online meetings in February and met in parallel to the plenary session of the Joint Meeting. 31 experts from 16 states, the European Union Agency for Railways and 7 non-governmental organisations took part in the work of this working group.

Avoidance of duplicate leakproofness tests for battery-wagons, battery-vehicles and multiple-element gas containers (MEGC)

The working group on tanks dealt with a proposal from the European Cylinder Manufacturers Association (ECMA), which aimed to simplify the leakproofness testing of

battery-wagons, battery-vehicles and MEGCs in practice.

It is currently provided that the elements of such transport units - such as cylinder shells or large cylinder shells equipped with a closure - will be subjected to another leakproofness test after installation in the battery-wagon, battery-vehicle or MEGC, even if the individual elements with their valves have already been successfully tested during the initial test. This leads to considerable additional expenditure of time, energy and testing equipment, especially for larger systems with numerous elements.

ECMA therefore proposed that the leakproofness test should not be repeated if it can be proven that the elements and their valves were not dismantled after the initial inspection.

The working group on tanks welcomed the suggestion and agreed in principle with the proposal for clarification in RID/ADR 6.8.3.4.13. However, the question was raised as to who is responsible for the leakproofness test of the element and valve. As Chapter 6.2 of RID/ADR does not yet contain any explicit rules on leakproofness testing, it was suggested that responsibility should in future be regulated in RID/ADR 6.2.3.5.

The proposed text amendment was adopted in square brackets for the time being. Once responsibility for

the leakproofness test has been dealt with, the square brackets can be removed.

Heating equipment on tanks

Germany drew the attention of the working group on tanks to a loophole in the provisions on heating equipment on tanks. Unlike the detailed provisions for portable tanks in Chapter 6.7 of RID/ADR, there are not yet any specific requirements in Chapter 6.8 of RID/ADR for permanently installed heating equipment on tank-wagons, tank-vehicles and tank-containers.

The purpose of the heating equipment on tanks is to heat the dangerous substance during carriage or storage or to keep it at a certain temperature. In practice, various heating systems are used on tanks in accordance with Chapter 6.8. Many of these systems are operated externally. In this case, the dangerous substance is heated with hot water steam via a piping system, which is installed between the shell and the outer insulation. In some cases, heating equipment is installed on tanks that operate with their own combustion heater, which usually runs on diesel. Some of this equipment is operated independently with their own power supply and others via the tractive vehicle's power supply. There are also purely electrical heating devices.

However, owing to the lack

of provisions in Chapter 6.8, there are always uncertainties when assessing and inspecting this heating equipment, e.g. in connection with the tank type approval.

Germany therefore proposed that the provisions for heating equipment installed on portable tanks from Chapter 6.7 should also be adopted for RID/ADR tanks.

The requirements include the following:

- The substance heated by a heating system must not reach a temperature at which the pressure in the tank exceeds its maximum allowed working pressure (MAWP) or causes other hazards, e.g. dangerous thermal decomposition.
- Internal heating elements may only be used if they are completely submerged.
- The maximum temperature at the surface of the heating elements for internal heating equipment, or on the shell for external heating equipment is 80% of the autoignition temperature of the substance carried.
- Electrical heating systems must be equipped with a fuse or circuit breaker; for external, earthed power supplies, a residual current circuit breaker with a releasing current of less than 100 mA is required.
- Electrical switch cabinets must not have a direct connection to the tank interior and must provide protection of at least the equivalent of type IP 56 according to IEC 144 or IEC 529.

As these are a mixture of use and construction provisions, they are split between chapters 4.3 and 6.8 of RID/ADR. In addition, transitional

measures will be introduced that will allow tanks built before 1 January 2029 in accordance with the provisions in force until the end of 2026 to continue to be used.

Orange band on extra-large tank-containers for liquefied, refrigerated liquefied or dissolved gases

According to the current provisions of RID, tank-wagons for the carriage of liquefied, refrigerated liquefied or dissolved gases must be marked with a continuous orange band approximately 30 cm wide. Extra-large tank-containers with a volume of up to 73,500 litres and a payload of 66 tonnes achieve loading capacities comparable to tank-wagons and are mainly used in rail freight transport. Until now, however, they have not been subject to the requirement to display the orange band.

The RID Committee of Experts' standing working group discussed the orange band at its meeting in November 2024. With regard to the colouring, it adopted a reference to the colour shade "RAL 2003 pastel orange" and a reference to the permissibility of weather-related visual changes to the colour tone. In addition, it adopted the obligation to affix the orange band for extra-large tank-containers in square brackets in order first to inform the RID/ADR/ADN Joint Meeting so that the corresponding requirement is also included in ADR (see also Bulletin 1/2025, p. 17).

Although they are mainly used in rail freight transport, ADR already contains some provisions for extra-large tank-containers, such as a definition, minimum wall thickness requirements and the design pressure for closures. It was therefore proposed that the requirement to affix the orange band to extra-large tank-containers should also be included in ADR for reasons of consistency.

The working group on tanks adopted the proposal. The fact that many operators from the chemical industry have already voluntarily affixed the orange band to extra-large tank-containers for the carriage of liquefied, refrigerated liquefied or dissolved gases shows the necessity, acceptance and practical relevance of the measure.

Replacement of pieces of equipment in the context of maintenance

According to RID/ADR, modifications may only be made to tank equipment if they are covered by the type approval. In practice, this means that even if a defective valve is simply replaced with a technically equivalent model that is not listed in the original type approval, a supplement to the type approval is required - a procedure that is associated with high costs and longer tank downtimes.

The International Union of Wagon Keepers (UIP) submitted a proposal to the Joint Meeting with the aim of making it possible to replace certain equipment without having to apply for a change to the type approval.

Specifically, as part of an extraordinary inspection, the replacement of certain service equipment with equipment not listed in the type approval should be permitted without having to issue a supplementary type approval, provided that the following conditions are met:

The replacement equipment:

- must be approved in accordance with the relevant standard referenced in 6.8.2.6 or 6.8.3.6,
- must be of the correct technical specification for the tank,
- must not modify the initial dimensions and connections,

and the replacement must be carried out without any operation involving the application of heat to the tank (e.g. welding or similar).

The working group on tanks welcomed the proposal and was in favour of including it in RID/ADR 6.8.2.4.4 to ensure that an extraordinary tank inspection is carried out after replacement. This creates a practical option for replacing equipment parts on tanks without unnecessary administrative hurdles, while maintaining the same level of safety.

Requirements for inspection bodies in accordance with RID/ADR 1.8.6 and 1.8.7

On the basis of two informal documents from France and Germany, the working group on tanks again dealt with the requirements for inspection bodies in accordance with RID/ADR 1.8.6 and 1.8.7.

France drew attention to the current revision of the EN ISO/IEC 17020:2012 standard, which entails significant amendments in Annex A. In particular, these will have an impact on the definitions and categorisation of corresponding inspection bodies in accordance with RID/ADR 1.8.6 and 1.8.7. France therefore proposed a comprehensive revision process to clarify the definitions of different types of bodies, the definition of subcontracts and the conditions for their application, as well as the authorisation criteria for inspection bodies.

Germany again argued in favour of regulating the additional requirements for inspection bodies responsible for the approval and supervision of in-house inspection services in a more targeted manner. Instead of requiring full accreditation in accordance with the EN ISO/IEC 17021-1:2015 standard applicable to the

auditing and certification of management systems, Germany proposed that only compliance with certain provisions of the standard applicable to the auditing of in-house inspection services should be mandatory. Additional accreditation beyond the EN ISO/IEC 17020:2012 standard is not required. It was also proposed that the application procedures for various inspection activities be regulated clearly and in line with practice.

The RID/ADR/ADN Joint Meeting agreed to a proposal from the working group on tanks to set up an informal working group, led by France, to address the outstanding issues - including the impact of the revision of EN ISO/IEC 17020:2012, the requirements for inspection bodies for the supervision of in-house inspection services and other issues arising from the application of 1.8.6 and 1.8.7. The working group will report its findings to the Joint Meeting.

Questions of interpretation of RID/ADR/ADN

Application of recognised technical codes

RID/ADR 6.2.5 allows the competent national authorities to recognise technical codes provisionally in certain cases - for example if no corresponding standard is referenced in RID/ADR or in order to deal with specific aspects not addressed in the standards - provided that they ensure the same level of safety.

Germany put the question to the Joint Meeting as to the principles according to which technical codes recognised by a competent authority of an RID Contracting State or a Contracting Party to ADR may also be applied in other Contracting States or Contracting Parties. Germany was

of the view that, in accordance with the principle of territoriality, the application of such codes was restricted to the territory of the RID Contracting State or ADR Contracting Party whose competent authority has recognised the code. Other states can also recognise the code in order to allow it to be applied on their territory, but codes are not automatically valid beyond national borders.

In this context, Germany pointed out that an administrative decision under Directive 2010/35/EU on transportable pressure equipment suggested that a technical code recognised by one Member State could automatically be applied in other Member States. This interpretation contradicts the principles enshrined in RID/ADR 6.2.5.

The RID/ADR/ADN Joint Meeting confirmed the legal view held by Germany and did not consider it necessary to introduce a procedure for the mutual recognition of national technical codes between the RID Contracting States or ADR Contracting Parties.

The representative of the European Commission provided information on ongoing discussions within the European Union on this decision and announced that the decision would be re-examined. Germany and the European Commission will inform the RID/ADR/ADN Joint Meeting of further developments.

Marking and labelling of empty, cleaned packagings

The RID/ADR/ADN Joint Meeting dealt with the question of whether empty, cleaned packagings may continue to bear dangerous goods marks and labels if they demonstrably no longer contain any residues.

This question stems from a road traffic check in Luxembourg. An open vehicle with several hundred

empty, cleaned gas cylinders was checked - all the gas cylinders still bore dangerous goods marks for UN 1965 (propane). Although the driver confirmed that all the cylinders were empty and cleaned, the situation led to uncertainties in the interpretation of the regulations.

Belgium and Luxembourg analysed two relevant provisions:

- RID/ADR 4.1.1.11 prescribes that empty packagings that have contained a dangerous substance are subject to the same requirements as those for a filled packaging, unless adequate measures have been taken to nullify any hazard. This could lead to the conclusion that empty, cleaned packagings that no longer contain any residues are not dangerous and marking is no longer necessary - but is the marking then also prohibited?
- RID/ADR 4.1.8.4 contains an explicit requirement to nullify any hazard by removing or obliterating any label or mark on empty packagings for infectious substances of Class 6.2 once they have been disinfected or sterilized. There is no comparable requirement for empty packagings of other dangerous goods classes.

During the discussion, the RID/ADR/ADN Joint Meeting was unable to agree on a uniform interpretation. Some delegations were of the view that there was no need to amend the provisions, as the carriage of empty, cleaned packagings no longer came under RID/ADR. Others called for dangerous goods marking and labelling to be removed or taped over in order to avoid misinterpretations in the event of an incident. Other proposals concerned the carrying of an accompanying document stating that the dangerous goods regulations are not applicable, or

the inclusion of a clear obligation to remove or cover dangerous goods marks and labels on empty, cleaned packagings in Chapter 5.2, as already exists in Chapter 5.3 (5.3.1.1.6) for placards.

However, most delegations agreed on one point: more precise regulation is urgently required to prevent misuse by dangerous goods marks and labels being kept on, unnecessary emergency interventions in the event of incidents or even a loss of trust in dangerous goods marking. Several delegations announced that they would submit written statements at a later date. It remains to be seen whether the RID/ADR/ADN Joint Meeting will decide on a specific amendment to the provisions of RID/ADR at one of its future meetings.

Other proposals

Marking provisions for acetylene cylinders

Since 1 July 2023, newly manufactured acetylene cylinders have been subject to stricter marking requirements in accordance with 6.2.2.7.3 (k) and (l). These require additional marks, which must be affixed to the cylinder shoulder or to a neck ring. Acetylene cylinders manufactured before 1 July 2023 may only continue to be used without these additional marks until the next periodic inspection.

In practice, however, it has become apparent that not all cylinder types offer sufficient physical space to affix the required marks, particularly in the case of older designs or cylinders with a small volume. As a result, it is not technically possible to implement the provision, which calls into question the continued use of such cylinders.

The European Industrial Gases

Association (EIGA) therefore proposed amendments to the Joint Meeting which would allow the continued use of acetylene cylinders without the marks prescribed in 6.2.2.7.3 (k) and (l) if it is not possible to affix the marks. As the UN Sub-Committee of Experts on the Transport of Dangerous Goods had already adopted a corresponding proposal for the UN Model Regulations at its 65th session (Geneva, 25 November to 3 December 2024) (see p. 9 in this issue of the Bulletin), the RID/ADR/ADN Joint Meeting also agreed to the proposed amendments in the form of a new transitional measure in 1.6.2, which applies to both UN acetylene cylinders and acetylene cylinders that are not UN pressure receptacles.

Extending the estimation of quantities in the carriage of waste

Since the provisions on estimating the quantity for the carriage of hazardous wastes were introduced in the 2023 edition of RID/ADR, it has only been possible to carry a few types of waste under certain conditions with estimated quantities in the transport document, such as medical or clinical wastes (UN number 3291) that are already packed in accordance with RID/ADR packing instruction P 621 or wastes in vacuum-operated waste tanks. In practice, however, it has been shown that even for carriage in tanks other than vacuum-operated waste tanks, for example the carriage of used oils collected in workshops or medical or pharmaceutical wastes, it is often not possible to determine the exact quantity at the place of loading due to the lack of suitable weighing equipment.

The European Federation of Waste Management and Environmental Services (FEAD) submitted a proposal to the Joint Meeting to

extend the applicability of quantity estimation under certain conditions. The RID/ADR/ADN Joint Meeting adopted the proposal. This means that in future, quantity estimates will also be permitted for tanks other than vacuum-operated waste tanks for wastes, provided that a device or procedure is used to ensure compliance with the prescribed degrees of filling. In addition, quantity estimates are permitted for medical or clinical wastes of UN 3291 packed in accordance with RID/ADR packing instructions IBC 620 or LP 621, for aerosols of UN 1950, for gas cartridges of UN 2037 and for wastes where inner packagings of different sizes and shapes are packed together in an outer packaging.

Carriage of empty, uncleaned packagings for disposal

The carriage of empty, uncleaned packagings for disposal, recycling or reuse of its materials is currently carried out under the entry UN 3509 PACKAGINGS, DISCARDED, EMPTY, UNCLEARED. In this case, either an outer packaging must be used or the packagings must be carried in bulk. Large drums (more than 150 litres) or intermediate bulk containers (IBCs) for which, for example, the period for the periodic inspection has expired or for which complete documentation is no longer available, must also be carried under UN number 3509. However, as they are too large to be packed, carriage in bulk is the only alternative.

The European Federation of Waste Management and Environmental Services (FEAD) submitted a

proposal to the Joint Meeting to allow empty, uncleaned drums and IBCs containing small quantities of residues that can only be removed with disproportionate technical effort to be carried as packages for disposal, recycling or reuse of their materials, even if they are no longer covered by the approval certificate, for example if their period of use has expired, if they are overdue for periodic inspection or lack documentation. The following conditions must be met:

- Drums and IBCs must not exceed a capacity of 150 litres,
- They must not contain residues of certain dangerous substances, e.g. of Class 1, 2, 5.2, 6.2, 7, substances of packing group I, self-reactive substances of Class 4.1, asbestos or PCB-containing substances,
- They must remain upright and firmly closed,
- The labelling and marking must correspond to the residues present,
- The transport document must contain information that complies with 5.4.1.1.6.

The RID/ADR/ADN Joint Meeting adopted the proposal, thereby creating legal certainty for waste and disposal companies without lowering the existing level of safety.

Disposal of DOT pressure receptacles

In accordance with RID/ADR 1.1.4.7, pressure receptacles approved

by the United States Department of Transportation (DOT pressure receptacles) may be used for the import and export of gases. However, the carriage of empty, uncleaned DOT pressure receptacles to a disposal facility in an RID Contracting State or a Contracting Party to ADR is not yet permitted. The carriage of such pressure receptacles for disposal is currently only possible with salvage pressure receptacles, which means high costs and additional logistical effort.

The RID/ADR/ADN Joint Meeting adopted a proposal from the European Industrial Gases Association (EIGA) to allow DOT pressure receptacles imported into the RID/ADR area to be carried to a disposal facility. The DOT pressure receptacles may only be carried if they are leakproof and not severely damaged, if their operating condition was found to be good during the inspection and if the prescribed marks for certification, periodic inspection and filling are legible. In addition, they must be marked and labelled in accordance with Chapter 5.2.

Next session

The next RID/ADR/ADN Joint Meeting will be held in Geneva from 16 to 26 September 2025. The main task will be to harmonise RID/ADR/ADN with the 24th revised edition of the UN Recommendations on the Transport of Dangerous Goods, which was prepared by a working group that met on 15 and 16 April 2025.

Katarina Burkhard

CALENDAR OF OTIF'S MEETINGS IN 2025

DATE	EVENT	ORG	LOCATION
17 - 18 June	17 th session of the Committee of Technical Experts	UNECE	Berne - Switzerland (HYBRID MEETING)
19 June	Working Group WG TECH. 55 th Session		Berne - Switzerland (HYBRID MEETING)
9 September	Working Group WG TECH. 56 th Session		Berne - Switzerland (HYBRID MEETING)
16 - 26 September	RID/ADR/ADN Joint Meeting		Geneva - Switzerland
5 - 6 November	141 st Session of the Administrative Committee		Berne - Switzerland
17 - 21 November	19 th session of the RID Committee of Experts' standing working group		Luxembourg - Luxembourg
18 November	Working Group WG TECH. 57 th Session		Brussels - Belgium (HYBRID MEETING)
2 - 4 December	8 th session of the ad hoc Committee on Legal Affairs and International Cooperation		Berne - Switzerland

EVENTS WITH OTIF PARTICIPATION IN 2025

DATE	EVENT	ORG	LOCATION
27 - 29 June	Global Transport Connectivity Forum 2025	★	Istanbul - Türkiye
30 June - 4 July	66 th session of the UN Sub-Committee of Experts on the Transport of Dangerous Goods	UNECE	Geneva - Switzerland
2 - 3 July	Railway Interoperability and Safety Committee (RISC)	European Commission	Brussels - Belgium (HYBRID MEETING)
25 - 29 August	RID/ADR Editorial and Translation Conference	★★	Switzerland
26 - 29 August	Temporary Working Group on Annex 2 to SMGS "Provisions for the Carriage of Dangerous Goods"	OSJD	Warsaw - Poland
15 - 16 September	11 th Annual Meeting of International Organisations	OECD	Paris - France
14 - 15 October	Group of Experts on Annex 2 to SMGS "Provisions for the Carriage of Dangerous Goods"	OSJD	Warsaw - Poland

★ Ministry of Transport and Infrastructure (Türkiye)

★★ Federal Roads Office (FEDRO)

EVENTS WITH OTIF PARTICIPATION IN 2025

DATE	EVENT	ORG	LOCATION
16 - 17 October	OSJD Commission for Transport Law in the field of provisions for the carriage of dangerous goods	OSJD	Warsaw - Poland
3 - 7 November	Working Party on the Transport of Dangerous Goods, WP.15 (118 th session)	UNECE	Geneva - Switzerland
12 - 14 November	79 th session of the Working Party on Rail Transport (SC.2)	UNECE	Geneva - Switzerland
13 - 14 November	UIC Group of Experts on the Carriage of Dangerous Goods	UIC	Duisburg - Germany
24 November - 3 December	67 th session of the UN Sub-Committee of Experts on the Transport of Dangerous Goods	UNECE	Geneva - Switzerland



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The Bulletin editor

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