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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF  
DANGEROUS GOODS AND ON THE GLOBALLY  
HARMONIZED SYSTEM OF CLASSIFICATION  
AND LABELLING OF CHEMICALS**

**Sub-Committee of Experts on the  
Transport of Dangerous Goods**  
(Twenty-first session, 1-10 July 2002  
agenda item 10)

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO  
THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS**

**Chapter 5.1 – Marking of overpacks**

**Transmitted by the expert from the Netherlands**

**INTRODUCTION**

In some circumstances the use of overpacks leads to problems with respect to the enforcement of regulations.

When the contents of a overpack are not visible from outside, e.g. by using a metal drum or wooden box as an overpack, enforcement bodies are confronted by seeing a “packaging” *with* indications of proper shipping name, UN number and danger label, but *without* UN markings as mentioned in 6.1.3, 6.5.2 or 6.6.3.

In many cases such “packagings” (without a UN mark) will not be recognised as overpacks by enforcement authorities. Whether the “packaging” is an *overpack* or a *package (which should bear a UN mark)* should be made more clear.

To increase the enforceability and avoid delay during transport it should be considered to identify the use of non-transparent overpacks during transport. The Netherlands think that a specific identification on the overpack itself is preferable to a general identification in the transport document.

**PROPOSAL**

The beginning of 5.1.2.1 will read as follows:

“An overpack shall be marked with the word “OVERPACK” and with the proper shipping name.....unless....”