

OTIF



ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBAHNVERKEHR

INTERGOVERNMENTAL ORGANISATION FOR INTER-
NATIONAL CARRIAGE BY RAIL

INF.7

20 January 2006

Original: German

RID/ADR

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern, 20-24 March 2006)

Placards and orange-coloured marking on carrying wagons for piggyback transport

Transmitted by the Secretariat of OTIF

At the 42nd session of the RID Committee of Experts (Madrid, 21 – 25 November 2005), Belgium's document OCTI/RID/CE/42/5h) and the Secretariat's document OCTI/RID/CE/42/5i) were discussed together with the related informal documents INF.5e) and INF.5d) submitted by UIC, which contained proposals for amendments concerning placarding and the orange-coloured marking on carrying wagons used in piggyback transport (see Annexes 1, 2, 4 and 5).

Although these proposed amendments are ostensibly specific to RID, it very quickly became clear in the discussion at the RID Committee of Experts that these documents should be dealt with in the RID/ADR/ADN Joint Meeting, in order that references to particular RID requirements for piggyback transport can be included in ADR and the subsequent marking of piggyback transport at transshipment stations can be avoided (see especially paragraphs 53 and 56 of report A 81-03/501. 2006 reproduced in Annexes 3 and 6).

In order to dispel the problems of interpretation that exist, the RID Committee of Experts took decisions for RID, which will enter into force on 1 January 2007 (see Annexes 3 and 6).

The Joint Meeting is requested to examine these problems and to come to a decision for the provisions of RID and ADR. The representative of Belgium will submit a separate proposal to the Joint Meeting on the problems outlined in document OCTI/RID/CE/42/5h) (see paragraph 48 of report A 81-03/501.2006 in Annex 3).

For reasons of cost, only a limited number of copies of this document have been made. Delegates are asked to bring their own copies of documents to meetings. The Central Office only has a small number of copies available.

It should be checked in particular whether the suggestions for ADR proposed by UIC in informal documents INF.5e) and INF.5d) (see Annexes 3 and 5) should be proposed to WP.15 for adoption. However, with regard to the suggestion in Annex 3, it should be pointed out that for ADR 2007, WP.15 decided to delete the Note to 5.3.1.5.2 and to include instead a new sub-paragraph 1.1.4.2.2 as follows:

“1.1.4.2.2 Transport units composed of a vehicle or vehicles other than those carrying containers, portable tanks or tank containers as provided for in 1.1.4.2.1 (c), which are not placarded in accordance with the provisions of 5.3.1 of ADR but which are marked and placarded in accordance with Chapter 5.3 of the IMDG Code, shall be accepted for carriage in a transport chain including maritime transport provided that the orange-coloured plate marking provisions of 5.3.2 of ADR are complied with.”

[Reference document: TRANS/WP.15/2004/38 + TRANS/WP.15/181]

OCTI/RID/CE/42/5h)

26 October 2005

Original: French

RID: **42nd Session of the Committee of Experts on the Transport of Dangerous Goods**
(Madrid, 21 - 25 November 2005)

Subject: **Placarding of carrying wagons**

Proposal transmitted by Belgium

Summary

Amend 5.3.1.3 to cover the case of small containers and the case of vehicles (piggyback transport) carrying packages and bearing placards.

Introduction

At the European Commission meeting on 20 June 2005, various countries asked whether the correct place for derogations such as the United Kingdom's derogation RA-SQ 15.5 and France's derogations RA-SQ 6.5 and RA-SQ 6.5 was in fact in national derogations for small quantities.

These derogations read as follows:

RA-SQ 6.5: "The placarding of wagons on which containers are loaded is not necessary if the placards affixed to the containers are clearly visible."

RA-SQ 6.6 and 15.5: "The placarding of wagons is not necessary if the road vehicles bear placards corresponding to the packages being carried."

In Belgium's view, it is not very logical to deal with these types of problems in national derogations relating to small quantities. These problems can be dealt with easily by amending 5.3.1.3.

Proposals

1. RA-SQ 6.5

The problem arises from the fact that 5.3.1.3 refers to large containers. France has introduced a derogation to cover the case of small containers.

Proposal 1:

In 5.3.1.3 and 5.3.1.3.1, replace "large containers" with "containers".

Section 5.3.1.3 would then read as follows:

5.3.1.3 Placarding of wagons carrying containers, MEGCs, tank-containers or portable tanks and of wagons used for piggyback transport

5.3.1.3.1 If the placards affixed to the **containers**, MEGCs, tank-containers or portable tanks are not visible from outside the carrying wagons, the same placards shall also be affixed to both sides of the wagon. Otherwise, no placard need be affixed on the carrying wagon.

Remark by the Secretariat of OTIF:

The whole of section 5.3.1 in RID differs in principle from section 5.3.1 of ADR in this respect.

In a Note to 5.2.2, RID says that for labelling purposes, small containers are to be considered as packages, because for these, only the normal danger label size (100 x 100 mm) is required. As a result, the whole of section 5.3.1 then deals only with large containers.

In contrast, section 5.3.1 of ADR prescribes placards both for large containers and for small containers and then in 5.3.1.7.3, allows placards to be replaced with danger labels on small containers.

If Belgium's proposal were to be adopted, the whole of section 5.3.1 would have to be revised and the Note to 5.2.2 would have to be deleted.

2. RA-SQ 6.6 and 15.5

In Belgium, various intermodal transport companies have also asked whether it is necessary to placard carrying wagons in piggyback transport if the vehicles being carried bear the placards required under RID. Even if it is not necessary under ADR to affix placards on vehicles carrying packages, two cases arise in Belgium:

- either the intermodal transport companies ask the original consignor, for a road-rail transport operation, to affix the placards required for rail transport himself,
- or, for organisational reasons, the placards are affixed to the vehicle before it is loaded on to the carrying wagon (this operation being carried out using a crane, without any personnel on the ground).

Belgium sees no safety problems in affixing the placards to the vehicle rather than to the carrying wagon.

Proposal 2:

Amend 5.3.1.3.2 to read as follows:

"5.3.1.3.2 Carrying wagons used in piggyback transport shall bear the placards on both sides.

The placarding of carrying wagons used in piggyback transport is not necessary

- (a) where use is made of the "rolling road" system (loading of lorries with or without trailer and of semi-trailers with tractor on wagons used for this system of transport), unless the railways concerned on a particular route decide to the contrary;
- (b) for other carriage of road tank vehicles and road vehicles carrying dangerous goods in bulk;
- (c) for the carriage of road vehicles carrying packages when these vehicles visibly bear placards corresponding to the packages being carried."**

Justification

- If the placards are visible, it is not necessary to repeat them on the carrying wagon.
 - Replacing "large containers" with "containers" aligns with ADR 5.3.1.3.
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11 November 2005

Original: German

RID: 42nd Session of the Committee of Experts on the Transport of Dangerous Goods
(Madrid, 21 - 25 November 2005)

Comments from UIC on document OCTI/RID/CE/42/5h)

Introduction

In its proposal OCTI/RID/CE/42/5h), Belgium proposes to amend RID 5.3.1.3 to take account of the case of small containers and the case of vehicles (piggyback transport) in which packages are carried and which bear placards.

In **Proposal 1**, which is to cover the case of small containers, Belgium proposes to replace “large container” with “container” in 5.3.1.3 and 5.3.1.3.1. In this respect, the Secretariat of OTIF pointed out in its remark the differences between RID 5.3.1 and ADR 5.3.1.

In **Proposal 2**, which is to cover the case of vehicles (piggyback transport) in which packages are carried and which bear placards, Belgium proposes to add a new paragraph (c) to 5.3.1.3.2.

UIC discussed both these proposals at the meeting of the Group of Experts on the Transport of Dangerous Goods held on 10.11.2005 in Warsaw, and has the following suggestions:

Suggestions

a) On Proposal 1 (small containers)

UIC's view is that the proposed amendment is unnecessary, as no small containers are carried on carrying wagons for intermodal transport.

However, in view of the OTIF Secretariat's remark concerning Belgium's Proposal 1, UIC suggests that the RID/ADR/ADN Joint Meeting should look at the issue of the different rules in RID/ADR concerning the labelling/marketing of small containers, with the aim of achieving harmonisation.

b) On Proposal 2 (vehicles with packages in piggyback transport)

UIC is of the view that the further exemption from the placarding requirements for carrying wagons used in piggyback transport proposed by Belgium does not resolve the real problem sufficiently.

The real problem is that according to ADR 5.3.1.5, vehicles carrying packages need only bear placards on both sides and at the rear of the vehicle when carrying goods of classes 1 and 7.

If this provision were extended to cover the other classes, affixing placards to carrying wagons used in piggyback transport could be dispensed with in all cases, i.e. not just in truck on train (“rolling road”) transport and other transport of road tank-vehicles and road vehicles carrying dangerous goods in bulk.

This could reduce the time and effort spent in transshipment stations on subsequently affixing the placards to the vehicle/carrying wagon, and procedures at the road/rail interface could be speeded up considerably.

In addition, RID 5.3.1.3.2 could be simplified considerably, particularly as according to a survey among the railways, no use is made in any rolling road transport connection of the possibility allowed under 5.3.1.3.2 (b) of a “decision to the contrary”. In addition, the carrying wagons used in piggyback transport in no way obscure the visibility of the placards affixed to the road vehicles. Thus there is no need to affix placards to carrying wagons, either for the rolling road because the railways do not decide otherwise, or because of the design of carrying wagons.

The only need to affix placards to carrying wagons arises from the fact that in principle, no placards are affixed to road vehicles not carrying goods of classes 1 or 7. However, if no placards need be affixed in road transport, they cannot be visible at the road/rail interface, so that the carrying wagons have to be provided with placards in accordance with the current provisions of RID. This disparity, which hampers procedures in the transshipment stations, should be resolved by a suitable addition in the Note to ADR 5.3.1.5.2, which already contains a corresponding rule in connection with carriage by sea.

Proposal for RID

RID 5.3.1.3.2 should read as follows:

5.3.1.3.2 The placarding of carrying wagons used in piggyback transport is not necessary if the road vehicles being carried bear the placards prescribed in accordance with ADR.”

Proposal for ADR

The following should be added to the end of the Note in ADR 5.3.1.5.2:

“The 1st and 2nd sentences apply by analogy to combined road/rail transport.”

Justification

- The amendments proposed would solve the problems that exist in the carriage of road vehicles with packages in piggyback transport. The problems that exist at present are namely that placards only have to be affixed to road vehicles for the carriage of goods of classes 1 and 7.
- This disparity should be resolved, because in other types of piggyback transport (carriage of road tank-vehicles etc.) and in other intermodal transport (including the carriage of swap-bodies containing packages!) the problems surrounding placards have already been resolved by means of appropriate rules in RID/ADR.
- The amendments would reduce the time and effort needed in transshipment stations and simplify and accelerate procedures.
- The addition proposed for ADR also seems sensible, because corresponding rules already exist for sea/road transport along the lines of the UIC proposal.

**Extract from the report of the 42nd session of the RID Committee of Experts
(document A 81-03/501.2006)**

Placards and orange-coloured marking on carrying wagons

Placarding of carrying wagons

Document: OCTI/RID/CE/42/5h) (Belgium)

Informal document: INF.5e) (UIC)

48. As a result of the Secretariat's remark in the document, the representative of Belgium withdrew the first proposal in her document concerning the extension of the requirement in 5.3.1.3.1 to cover small containers, and will submit a new proposal to the Joint Meeting. In connection with this, the representative of UIC pointed out that at the last Joint Meeting, the reference to UIC leaflet 590 concerning small containers had been deleted after UIC had withdrawn this leaflet, with the justification that small containers were deemed to be packages.
49. The second proposal was aimed at removing a practical problem in transshipment stations and proposed to do away with placards on carrying wagons if the road vehicles bear the placards corresponding to the packages being carried. However, according to ADR, placards are only prescribed for road vehicles carrying packages containing substances of classes 1 and 7.
50. In its informal document INF.5e), UIC suggested simplifying the whole of 5.3.1.3.2 and to do away with placards on carrying wagons in all cases where the road vehicles bear the placards prescribed under ADR. It was also proposed to broaden the Note in 5.3.1.5.2 of ADR to cover combined road/rail traffic as well. (Note by the Secretariat: WP.15 decided to delete the Note to ADR 5.3.1.5.2 in the 2007 edition and to insert a new 1.1.4.2.2 instead).
51. The following points of view were expressed in the discussion:
- 5.3.1.3.2 should be deleted completely and the principle of 5.3.1.3.1 should also be extended to cover piggyback transport (Netherlands).
 - To facilitate intermodal transport, 5.3.1.3.2 should be deleted completely, as orange-coloured marking on carrying wagons is not prescribed either. As the instructions in writing have to be attached to the consignment note, sufficient information was available. All the requirements concerning piggyback transport could be put together in 1.1.4.4 (United Kingdom).
 - It did not make sense to affix placards to carrying wagons if they were not necessary for the road journey. The question also arose in rail transport as to whether there was any advantage for the fire services in affixing different placards for different dangerous goods for the carriage of packages (Austria).
 - 5.3.1.3.2 should be kept, as the fire services and railway staff had to have as much information as possible (France and Belgium).
52. As the UIC proposal required a decision by WP.15, only the Belgian proposal was put to the vote. Following an editorial amendment (see Annex 1), the proposal was adopted by 9 votes in favour.

53. The representative of the United Kingdom announced a proposal to group together all the provisions for piggyback transport in RID 1.1.4.4. Several delegations recommended that a discussion be held in the Joint Meeting on placarding and orange-coloured marking in piggyback transport so that the amendments required in ADR could also be debated there.

Extract from the adopted texts (document A 81-03/501.2006/Add.1)

5.3.1.3.2 Add a new paragraph (c) to read as follows:

"(c) for other carriage of road vehicles carrying packages when these vehicles visibly bear placards corresponding to the packages being carried."

[Reference document: OCTI/RID/CE/42/5h]

OCTI/RID/CE/42/5I)

14 October 2005

Original: German

RID: 42nd Session of the Committee of Experts on the Transport of Dangerous Goods
(Madrid, 21 - 25 November 2005)

Subject: Orange-coloured marking of road vehicles carried in piggyback transport

Proposal transmitted by the Secretariat of OTIF

Summary

While in certain cases RID exempts wagons carrying road vehicles in piggyback transport from bearing placards, RID is silent on whether, for piggyback transport, the orange-coloured markings required under ADR are sufficient or whether orange-coloured markings are also necessary on the carrying wagons.

In order to avoid problems of interpretation, the RID Committee of Experts is asked to decide which rule should apply to piggyback transport.

Introduction

In various places, RID contains particular instructions for piggyback transport.

Section 1.1.4.4 prescribes that vehicles and their contents handed over for piggyback transport must meet the provisions of ADR. In addition, a Note refers to the special provisions of 5.3.1.3 (placarding of carrying wagons) and of 5.4.1.1.9 (providing the hazard identification number in the consignment note for the carriage of tanks or goods in bulk; attaching instructions in writing).

In 1.2.1, piggyback transport is defined as the carriage of road vehicles on rail wagons.

The general provision in the first sub-paragraph of 5.3.1.3.2 requires that carrying wagons used in piggyback transport must bear the placards on both sides. The second sub-paragraph follows with an exemption from this requirement where use is made of the "rolling road" system and for other carriage of road tank vehicles and road vehicles carrying dangerous goods in bulk.

Section 5.3.2, which deals with the orange-coloured marking, contains no specific reference to

piggyback transport, although in road transport, derogations are possible that are not permitted under RID. For example, the individual tanks of tank-vehicles having one or more tanks for the carriage of fuels of UN Nos. 1202, 1203, 1223, 1268 or 1863 need not bear orange-coloured plates on the sides if the tank-vehicle bears at the front and rear an orange-coloured plate bearing the information concerning the most hazardous substance being carried (see ADR 5.3.2.1.3). The possibility also exists not to have orange-coloured plates on the sides of vehicles carrying only one substance (see ADR 5.3.2.1.6). The blank orange-coloured marking (orange-coloured plate not showing the hazard identification number and UN number) does not exist in RID.

At the request of Belgium (see document OCTI/RID/GT-III/2005/31 (TRANS/WP.15/AC.1/2005/31)), the following new 5.3.2.1.5 was included. It is based on 5.3.1.3.1, which applies to placards:

"If the rectangular, orange-coloured plate marking prescribed in 5.3.2.1.1 affixed to the large containers, MEGCs, tank-containers or portable tanks is not clearly visible from outside the carrying wagon, the same marking shall also be affixed on both sides of the wagon."

This paragraph makes no mention of road vehicles carried in piggyback transport. There is also no mention anywhere else in 5.3.2 of which markings are accepted in piggyback transport. In checks carried out on rail transport, this leads to differing interpretations of RID.

Proposal

Option 1

If the RID Committee of Experts is of the view that for piggyback transport, the orange-coloured marking required under ADR is sufficient and that it is not necessary for carrying wagons to bear a separate marking, this should be set out in a separate paragraph, because in the Secretariat's opinion, the wording of the second sentence of 1.1.4.4 is not sufficient for this interpretation.

This alternative probably corresponds to current practice.

Amend 5.3.2.1.6 (see document OCTI/RID/CE/42/4a) to read:

5.3.2.1.6 For road vehicles carried with the orange-coloured plates prescribed in ADR, it shall not be necessary to affix the orange-coloured marking to carrying wagons used for piggyback transport."

Consequential amendment:

Amend the first sentence of the Note to 1.1.4.4 to read:

"For the placarding **and orange-coloured marking** of wagons used in piggyback transport, see 5.3.1.3.2 and 5.3.2.1.6."

Option 2

If the RID Committee of Experts is of the view that the orange-coloured marking is to be affixed to carrying wagons used in piggyback transport in those cases where the orange-coloured markings affixed to road vehicles are not visible outside the sides of the carrying wagons, the rule contained in new 5.3.2.1.5 should be transposed to piggyback transport in a separate paragraph.

However, in this case, the following features of ADR should be borne in mind:

- in contrast to RID, ADR has a blank orange-coloured marking (orange-coloured plate without the hazard identification number and UN number), which has to be affixed at the front and rear of transport units (see ADR 5.3.2.1.1);
- in ADR, the individual tanks of tank-vehicles having one or more tanks for the carriage of fuels of UN Nos. 1202, 1203, 1223, 1268 or 1863 need not bear orange-coloured plates on the sides if the tank-vehicle bears at the front and rear an orange-coloured plate bearing the information concerning the most hazardous substance being carried (see ADR 5.3.2.1.3);
- The possibility also exists not to have orange-coloured plates on the sides of vehicles carrying only one substance (see ADR 5.3.2.1.6).

In order to limit the additional work resulting from these cases at transshipment stations for piggyback transport, a Note would have to be added to ADR in 5.3.2.1.3 and 5.3.2.1.6 saying that these relaxations do not apply to piggyback transport.

In contrast, for the "rolling road" system, the same exemption should apply as for placarding (see 5.3.1.3.2), as the trains in this case are complete train loads and the road vehicle drivers are on board the train in a separate passenger carriage within the train formation.

5.3.2.1.6 "If the rectangular, orange-coloured plate marking prescribed in 5.3.2.1.2 and 5.3.2.1.4 affixed to the road vehicles carried in piggyback transport is not clearly visible from outside the carrying wagon, the same marking shall also be affixed on both sides of the wagon.

It is not necessary to affix the orange-coloured marking on carrying wagons used in piggyback transport where use is made of the "rolling road" system (loading of lorries with or without trailer and of semi-trailers with tractor on wagons used for this system of transport), unless the railways concerned on a particular route decide to the contrary."

Consequential amendment:

Amend the first sentence of the Note to 1.1.4.4 to read:

"For the placarding **and orange-coloured marking** of wagons used in piggyback transport, see 5.3.1.3.2 and 5.3.2.1.6."

INF. 5d)

11 November 2005

Original: French

RID: 42nd Session of the Committee of Experts on the Transport of Dangerous Goods
(Madrid, 21 - 25 November 2005)

Comments from UIC on document OCTI/RID/CE/42/5I)

UIC supports option 1 in the proposal by the Secretariat of OTIF.

However, in order to ensure in rail transport the systematic presence of an orange-coloured marking on the sides of road vehicles, UIC proposes to include a Note in ADR 5.3.2.1.3 and 5.3.2.1.6 saying that these relaxations do not apply to piggyback transport.

**Extract from the report of the 42nd session of the RID Committee of Experts
(document A 81-03/501.2006)**

Orange-coloured marking of road vehicles carried in piggyback transport

Document: OCTI/RID/CE/42/51) (Secretariat)

Informal document: INF.5d) (UIC)

54. In its document, the Secretariat noted that there is no information in RID on whether in piggyback transport the orange-coloured markings prescribed in ADR are sufficient or whether orange-coloured markings are also required on carrying wagons. In its informal document, UIC supported option 1 (orange-coloured marking on carrying wagons only if the road vehicles do not bear the orange-coloured plates prescribed under ADR), but also proposed including a Note in 5.3.2.1.3 and 5.3.2.1.6 of ADR.
55. As option 2 in the proposal (marking the carrying wagon if the orange-coloured marking on the sides of road vehicles is not visible) and as UIC's proposal would need to be discussed in the Joint Meeting (see also paragraph 53 concerning the discussion on placards on carrying wagons), the RID Committee of Experts supported option 1 with 10 votes in favour, but with a restriction with respect to the relaxations in 5.3.2.1.3 and 5.3.2.1.6 of ADR (see Annex 1).
56. As already explained for placards (see paragraph 53), a requirement should subsequently be brought in at the Joint Meeting to rule out having to affix marking later in transshipment stations.

Extract from the adopted texts (document A 81-03/501.2006/Add.1)

1.1.4.4 Amend the first sentence of the Note to read as follows:

"For the placarding and orange-coloured marking of wagons used in piggyback transport, see 5.3.1.3.2 and 5.3.2.1.6."

[Reference document: OCTI/RID/CE/42/51)]

5.3.2.1.6 Amend to read as follows

"5.3.2.1.6 For road vehicles carried with the orange-coloured plates prescribed in ADR, it shall not be necessary to affix the orange-coloured marking to carrying wagons used for piggyback transport. This does not apply when the tank-vehicles or transport units are marked in accordance with 5.3.2.1.3 or 5.3.2.1.6 of ADR."

[Reference document: OCTI/RID/CE/42/51)]
