

OTIF



**ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBAHNVERKEHR**

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

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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."

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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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