
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).

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.
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 transhipment 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."