RID: 46th Session of the Committee of Experts on the Transport of Dangerous Goods
(Hamburg, 21-23 October 2008)

Subject: Report of the informal working group on markings in piggyback transport (Vienna, 7 and 8 July 2008)

Transmitted by the International Union of Railways (UIC)

1. At the request of the RID Committee of Experts (Zagreb, 19 – 23 November 2007) the UIC organised a working group on “markings in piggyback transport” in order to resolve the problems that had been raised at recent meetings. This working group met on 7 and 8 July in Vienna (Austria). Annex 4 contains a list of participants. The working group had access to contributions and comments from several States on the UIC/UIRR working document that had been distributed previously. Annex 3 contains a list of reference documents.

2. The working group was chaired by Jean-Georges Heintz, head of the UIC delegation. As a first step, the working group examined all the documents submitted by States in connection with the UIC/UIRR draft. The second step was for participants to amend the draft.

Comments and contributions from States

3. Written contributions were received from Belgium, France, the Netherlands, Switzerland and the United Kingdom. These mainly concerned editorial comments, which were largely taken into account in UIC’s revised proposal. Only Belgium said that it was explicitly opposed to the principle being pursued by UIC, which was to allow the markings approved for road transport to be used not just on the rolling road, but in piggyback transport generally, i.e. to dispense with any subsequent marking of carrying wagons.

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. OTIF only has a small number of copies available.
4. In addition to the practical difficulties facing the railways, France’s contribution emphasised the current lack of clarity in the description of the technologies used in combined transport. The French contribution also made reference to the contribution from Belgium, which set out clearly the various scenarios with regard to placarding. The table submitted by Switzerland was along the same lines.

5. The solution to the problems as set out in the UIC/UIRR draft only concerned piggyback transport, whereas this subject affected combined transport in general. France was of the view that the problems that had been raised would be easier to resolve if there were a clearer definition of the term “combined transport” in coordination with the terms used in the official documents, particularly those of UNECE Working Party WP.24 (Working Party on Intermodal Transport and Logistics).

6. The contributions from the Netherlands and the United Kingdom proposed to amend the text of the UIC/UIRR draft to improve the text and system of RID.

7. However, in the Belgian contribution, which explicitly confirmed the practical problems for semi-trailers, a single orange-coloured blank plate at the rear of the vehicle (no marking on either of the sides or on the front of the vehicle) was not considered sufficient.

**Discussions and decisions**

8. The exchange of opinions between the participants led the working group to revise the draft and to propose improvement along the following lines.

9. Clarification of the definition of the term “piggyback transport” in RID 1.2.1. The possible clarification of the definitions concerning combined transport in its entirety could be the subject of a separate proposal.

10. Deletion of the words “if the placards are not visible outside the carrying wagons ...” originally proposed in 1.1.4.4.1 and 1.1.4.4.2, as the road vehicles carried in piggyback transport can only be loaded onto special carrying wagons (without side walls), so the markings that are affixed cannot be concealed.

11. Reorientation of the UIC/UIRR draft to piggyback transport, bearing in mind the fact that such transport may be performed either “accompanied” or “unaccompanied”.

12. Inclusion of a remark in the transport document, which was contained in an earlier edition of RID, to indicate that the transport in question was being carried out in accordance with the requirements for piggyback transport.

13. The participants were of the view that the current provisions concerning the information on the transport operation, particularly RID 1.4.2.2.5 and 1.4.3.6, guaranteed that the emergency services had reliable access to useful information.
Proposal

1.1.4.4 Amend to read as follows:

"1.1.4.4 Piggyback transport

Dangerous goods may also be carried in piggyback transport under the following conditions:

Vehicles and their contents handed over for transport shall meet the provisions of ADR.

The following shall not be permitted:

– explosives of Class 1, compatibility group A (UN Nos. 0074, 0113, 0114, 0129, 0130, 0135, 0224 and 0473);

– self-reactive substances of Class 4.1 requiring temperature control (UN Nos. 3231 – 3240);

– organic peroxides of Class 5.2 requiring temperature control (UN Nos. 3111 – 3120);

– sulphur trioxide of Class 8 at least 99.95% pure, without inhibitor, carried in tanks (UN No. 1829).

1.1.4.4.1 Placarding or marking of wagons carrying road vehicles

The placarding or marking of carrying wagons is not necessary when the road vehicles are placarded and marked in accordance with the placards and markings prescribed in Chapter 5.3 or 3.4 of ADR.

In addition, the placarding or marking of carrying wagons is not necessary when no placards or markings are prescribed for the road vehicles (e.g. 1.1.3.6 of ADR).

1.1.4.4.2 Orange-coloured plate marking of wagons carrying road vehicles

It shall not be necessary to affix the orange-coloured plates to carrying wagons when the road vehicles bear the orange-coloured plates prescribed in 5.3.2 of ADR.

1.1.4.4.3 Information in the transport document

For carriage in piggyback transport in accordance with 1.1.4.4, the following shall be entered in the transport document:

“CARRIAGE IN ACCORDANCE WITH 1.1.4.4.”.

For the carriage of tanks or dangerous goods in bulk for which ADR prescribes an orange-coloured plate with the hazard identification number, the hazard identification number shall be entered in the transport document before the UN number.

1.1.4.4.4 All the other provisions of RID remain unaffected."
Consequential amendments:

1.2.1 Amend the definition of “Piggyback transport” to read as follows:

“Piggyback transport” means the carriage of road vehicles (accompanied or unac-
companied) on rail wagons. This term also includes the “rolling road” (loading of lor-
ries with or without trailers, and of semi-trailers with tractor unit onto wagons used
for this type of carriage)."

5.3.1.3 Delete:

“and of wagons used for piggyback transport”.

Add a note as follows:

"Note. For the placarding of carrying wagons used in piggyback transport, see
1.1.4.4.1."

5.3.1.3.1 Delete the paragraph header

5.3.1.3.2 Delete.

5.3.2.1.6 Amend to read as follows:

"5.3.2.1.6 For the orange-coloured marking of carrying wagons used in piggyback transport,
see 1.1.4.4.2."

5.4.1.1.9 Amend to read as follows:

"5.4.1.1.9 Special provisions for piggyback transport

Note. For the information in the transport document, see 1.1.4.4.3."

Explanation and justification:

The proposed amendments to 1.1.4.4 take into account the problems that recur in practice in un-
accompanied piggyback transport as a result of the different marking provisions of ADR and RID,
which lead to delays and additional costs because markings have to be affixed subsequently; this
has a negative effect on the competitiveness of rail transport. No other carriage in combined trans-
port (e.g. carriage of tank-containers) presents any problems, as the marking provisions do not
differ in these cases.

Safety:

The placards and orange-coloured markings affixed to road vehicles are considered sufficient irre-
respective of how they are affixed, as in contrast to carriage by road, the infrastructure manager al-
ways has access to the UN numbers of the goods being carried and can make them available to
the emergency services immediately.

According to 5.3.1.3.2 (a), placards were not required on carrying wagons travelling on the rolling
road, although this type of transport is not always accompanied, but can also be carried out unac-
companied, so there is no difference to other piggyback transport (e.g. loading semi-trailers without
a tractor unit).
Feasibility:

No problems are anticipated with regard to feasibility. Because of the different marking provisions, the note included in an earlier edition of RID to inform those involved in the transport operation and the control authorities has been reintroduced.

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Annex 2

Photo 1: Tank semi-trailer – marking visible.

Photo 2: Container on a semi-trailer. If it contained dangerous goods, the marking would be visible.
Photo 3: Semi-trailer. If it contained dangerous goods, the marking would be visible.

Photo 4: Semi-trailer. The marking prescribed in ADR is visible.
Annex 3

Working papers


– Report of the RID/ADR Joint Meeting (Berne, 20 – 23 March 2006) TRANS/WP.15/AC.1/102, paragraphs 61 to 63

– Report of the 44th session of the RID Committee of Experts (Zagreb, 19 - 23 November 2007) OTIF/RID/CE/2007-A, paragraphs 32 to 34 and 49 to 50

  • Document OTIF/RID/CE/2007/4 (UIC) – Waiving the requirement for placarding on carrying wagons used for piggyback transport if road vehicles carrying packages in accordance with ADR bear placards

  • Document OTIF/RID/CE/2007/8 (UIRR) – Application of the exemption in ADR 1.1.3.6 to combined road/rail transport

  • Document OTIF/RID/CE/2007/20 (Comments from Belgium on document OTIF/RID/CE/2007/8) - Application of the exemption in ADR 1.1.3.6 to combined road/rail transport

– Working documents of the working group on markings in piggyback transport (Vienna, 7 and 8 July 2008):

  • Joint draft proposal by UIC and UIRR prepared at the UIC Group of Experts in Hilversum (Netherlands) (12 and 13 March 2008)

  • Comments on the draft proposal:
    ▪ Belgium (11 June 2008)
    ▪ France (24 June 2008)
    ▪ Netherland (24 June 2008)
    ▪ United Kingdom (30 June 2008)
    ▪ Switzerland (27 June 2008)
Annex 4

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