

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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(Zagreb, 19 - 23 November 2007)**

Subject: Limited quantities

Comments submitted by the International Union of Railways (UIC)

Introduction

At the last Joint Meeting, new sections 3.4.9 to 3.4.12 were included in RID/ADR on the basis of the report of the working group on limited quantities (ECE/TRANS/WP.15/AC.1/2007/60) and an informal document (INF.59) (see Annex 2 to the report of the Joint Meeting – ECE/TRANS/WP.15/AC.1/108/Add.2).

However, for the following reasons, it is not practicable to include these provisions in RID. In addition, ADR 3.4.10 contains an editorial mistake:

1. Editorial mistake

Section 3.4.10 (b) of ADR says that containers carrying packages with dangerous goods in limited quantities need not be marked in accordance with 3.4.12 when orange-coloured plate marking is displayed in accordance with 5.3.2.

However, containers carrying packages are not to be marked with orange-coloured plates in accordance with ADR 5.3.2, but with placards in accordance with ADR 5.3.1.

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2. The obligation to affix the markings has not been assigned to anybody

The new provisions concerning marking were incorporated as sections 3.4.9 to 3.4.12. However, it was not specified who should affix these markings to the wagons and large containers. According to 3.4.9, the consignor is simply required to inform the carrier of the gross mass of the goods to be sent thus.

3. Problems in carrying out these requirements in combined road/rail transport

According to ADR section 3.4.10 (b), containers carrying packages with dangerous goods in limited quantities need not be marked in accordance with 3.4.12 on all four sides when orange-coloured plate marking is displayed in accordance with ADR 5.3.2.

However, as according to 3.4.10 (b) the containers must be marked thus on all four sides for subsequent carriage by rail – unless they bear placards in accordance with RID 5.3.1 – and as the consignor has no information at all about the limited quantities for subsequent carriage by rail, this provision is not feasible.

Proposals

Proposal 1:

Amend RID 3.4.9 to read as follows:

"3.4.9 Loaders of dangerous goods packed in limited quantities shall observe the provisions of 3.4.10 to 3.4.12 concerning marking."

Proposal 2:

Amend ADR 3.4.10 (b) to read as follows:

"(b) Containers carrying packages with dangerous goods in limited quantities shall be marked in accordance with 3.4.12 on all four sides except when placards in accordance with 5.3.1 are already affixed."

Justification

In order to be systematic in the rules and owing to the fact that in rail transport, no combined load /additional load transport is carried out with goods wagons as in through road transport, the obligation to affix the marking should be assigned to the loader.

In order to avoid subsequent marking and additional costs at the road/rail interface in combined transport terminals, containers carried firstly by road vehicles should be marked on all four sides in accordance with 3.4.12 – alternatively with placards – unless the marking can be dispensed with in accordance with 3.4.11.
