

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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Subject: Comments from Belgium on document OTIF/RID/CE/2009/2 concerning piggy-
back transport

1. Belgium wishes to share the following comments concerning document OTIF/RID/CE/2009/2.
2. It is not usual to have provisions indicating what it is not necessary to do ("the placarding or marking of carrying wagons is not necessary"). For this reason, Belgium proposes different wording for 1.1.4.4.2 and 1.1.4.4.3.
3. There is some confusion in 1.1.4.4.3, because the provisions of 5.3.2.1.1, 5.3.2.1.3 and 5.3.2.1.6 of ADR are intended to apply to "transport units". But in the proposed 1.1.4.4.3, "road vehicles" are referred to, and this term also includes trailers and semi-trailers on their own. Of course ADR does not cover the case of the carriage of a trailer or semi-trailer without a motor vehicle. This is the particular case that 1.1.4.4.4 has to cover.
4. When the exemption in 1.1.3.6 is used, ADR prescribes that the total quantity of dangerous goods of each transport category must be indicated in the transport document. Belgium proposes that this requirement be repeated.

Proposal 1

5. Amend 1.1.4.4.2 to read as follows:

"1.1.4.4.2 Placards and marking

The placarding or marking prescribed for road vehicles in Chapter 5.3 or 3.4 of ADR shall be clearly visible. If this is not the case, it shall be repeated on both sides of the carrying wagon."

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.

Proposal 2

6. Amend 1.1.4.4.3 to read as follows:

"1.1.4.4.3 Orange-coloured plates

The orange-coloured plates prescribed for road vehicles in accordance with 5.3.2 of ADR shall be clearly visible. If this is not the case, they shall be repeated on both sides of the carrying wagon. For the carriage of packages, the orange-coloured plates may be replaced by the placards corresponding to the packages being carried."

Proposal 3

7. Amend 1.1.4.4.4 to read as follows:

"1.1.4.4.4 Carriage of trailers or semi-trailers without tractor unit

1.1.4.4.4.1 For the carriage of packages, if a trailer or semi-trailer is separated from its tractor unit:

- both sides of the trailer or semi-trailer shall bear visible placards corresponding to the packages being carried, or
- the trailer or semi-trailer shall bear on the front and the rear a visible blank orange-coloured plate in accordance with 5.3.2.2.1 of ADR.

If this is not the case, they shall also be affixed to both sides of the carrying wagon.

1.1.4.4.4.2 For carriage in tanks or in bulk, if a trailer or semi-trailer is separated from its tractor unit, it shall bear visible orange-coloured plates in accordance with 5.3.2.1.2 or 5.3.2.1.4 of ADR. If this is not the case, they shall also be affixed to both sides of the carrying wagon."

Proposal 4

8. Delete 1.1.4.4.5. If the above proposals are adopted, this paragraph will no longer be necessary.

Proposal 5

9. Add a paragraph (shown in bold) to 1.1.4.4.6 (renumbered 1.1.4.4.5) to take account of the application of 1.1.3.6 of ADR (see Note to 5.4.1.1.1 (f) of ADR)

"1.1.4.4.6 (new 1.1.4.4.5) Information in the transport document

For carriage in piggyback transport in accordance with this section, 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.

In the case of intended application of 1.1.3.6 of ADR, the total quantity of dangerous goods for each transport category shall be indicated in the transport document in accordance with 1.1.3.6.3."
