



OTIF/RID/CE/GTP/2017/9

15 August 2017

Original: English

RID: 8th Session of the RID Committee of Experts' standing working group
(Utrecht, 20 to 24 November 2017)

Subject: Placarding and protective distance

Proposal transmitted by Sweden

Related documents: Document OTIF/RID/CE/GTP/2015/5 and informal document INF.5 for the 5th session

Background

1. In informal document INF.5 submitted to the fifth session, three examples were presented to show the consequences of limited quantities combined with other dangerous goods and the result when provisions are carried over directly in the harmonisation process without adapting them to other rail provisions. However, in that document Sweden had not taken the protective distance regulations in 7.5.3 into consideration.

2. A few examples of the separation of wagons containing different dangerous goods are shown below.

	Wagon 1		Wagon 2		Protective distance
	Content	Placarding/ marking	Content	Placarding/ marking	
1	50 litres of UN 1170 Ethanol, 3, III in 5 plastic jerricans of 10 litres	Label No. 3	Class 1 UN 0009 Ammunition, incendiary, 1.2G, net mass 50 kg	Label No. 1	Yes
2	28 000 litres UN 1170 Ethanol, 3, III in 5 600 plastic jerricans of 5 litres	LQ	Class 1 UN 0009 Ammunition, incendiary, 1.2G, net mass 50 kg	Label No. 1	Not required
3	7 500 litres UN 1170 Ethanol, 3, III in 1 500 plastic jerricans of 5 litres	Not required	Class 1 UN 0009 Ammunition, incendiary, 1.2G, net mass 50 kg	Label No. 1	Not required
4	Piggyback with 1 250 litres UN 1170 Ethanol, 3, III in 50 plastic jerricans of 25 litres	Orange-coloured plates	Class 1 UN 0009 Ammunition, incendiary, 1.2G, net mass 50 kg	Label No. 1	Yes
5	60 kg UN 3077 Environmentally hazardous substance, solid, n.o.s., 9, III in a drum and 28 000 litres UN 1170 Ethanol, 3, III in 5 600 plastic jerricans of 5 litres	Label No. 9	Class 1 UN 0009 Ammunition, incendiary, 1.2G, net mass 50 kg	Label No. 1	Not required

3. Sweden is still of the view that there is a problem with the labelling and marking of wagons containing both limited quantities and other goods that require placarding. According to RID 3.4.13 (a), a wagon may display placards for the other goods only. The risk for people and the environment of e.g. a jerrican of 5 or 6 litres (10 litres in the example above) cannot be so crucial that the other goods take precedence in terms of how to display the hazard on a wagon. For road transport, the situation is different. Instead of a specific placard, only an orange-coloured plate is used. This is better than a misleading display indicating a hazard that is less dangerous than other hazards are. An alternative could be to use both label No. 9 and the LQ marking in example No. 5 above. The emergency services would also benefit from a more accurate display of the potential hazards.
4. 3.4.13 (a) could read:

"Wagons carrying dangerous goods packed in limited quantities shall be marked in accordance with 3.4.15 on both sides, except when the wagon contains other dangerous

goods for which placarding in accordance with 5.3.1 is required. ~~In this latter case, the wagon may shall display the required placards only, or both the placards in accordance with 5.3.1 and the marks in accordance with 3.4.15."~~

5. The provisions of 3.4.13 (b) should be dealt with in other international fora.
6. In addition, the illogical provisions for a protective distance between wagons are a problem from a risk analysis perspective (see examples 1 and 2 above). Sweden would therefore welcome a discussion on the possibility of including lower limits, together with the use of label models in section 7.5.3 of RID when separation is needed. This would avoid the inconsistency with the first example of 50 litres of ethanol that requires a protective distance from the wagon with explosives, but not from the wagon with 28 000 litres of ethanol. Separation from explosives is of course necessary when tank-wagons, portable tanks or tank-containers are included in a train, but is separation really necessary when 50 litres of flammable liquid are carried on another wagon?
7. The carrier has information on the gross mass for dangerous goods packed in limited quantities and for the gross mass, volume or net mass of other goods, as appropriate. A table showing the need for separation, including minimum gross mass or volume, could therefore be included in section 7.5.3. Otherwise, the separation provisions start from very low values. In ADR, unlike RID, explosives and other goods may be loaded on different vehicles of a transport unit.
8. Sweden would appreciate a discussion on these two subjects.
