RID: 50th Session of the Committee of Experts on the Transport of Dangerous Goods
(Malmö, 21 – 25 November 2011)

Subject: Placarding of swap-bodies

Proposal transmitted by Sweden

Introduction

1. A swap-body fixed on its trailer is considered as an ordinary trailer. In piggyback transport the provisions in 1.1.4.4 shall be applied. This paper addresses the placarding and marking provisions of single swap-bodies in transit between road and rail transport.

2. The report of the 49th session of the RID Committee of Experts (OTIF/RID/CE/2010-B, paragraphs 24 to 29) explains that a proposal on the placarding of swap-bodies should be submitted to the RID Committee of Experts.

3. New provisions in 1.1.4.4 on piggyback transport entered into force in 2011. It is no longer necessary to affix placards to trailers if the provisions of ADR are met, but a trailer or transport unit must be marked with orange-coloured markings.

4. In document OTIF/RID/CE/2010/18, Sweden had noted that there are differences in placarding requirements in RID depending on whether the same dangerous goods were sent in:
   - a swap-body loaded on a wagon or
   - a swap-body loaded on a trailer as piggyback transport or
   - an ordinary rail wagon.

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5. A swap body is a type of intermodal container that can be swapped from a lorry chassis to a rail wagon. This swapping is accomplished by lifting the load compartment while supporting its bottom.

6. The differences between swap bodies and containers are:

   • a swap body has a mechanical strength calculated for road, rail and ferry services which may be different from the mechanical strength of the ISO series of containers
   • the dimensions are usually tailored to maximise the volume of traffic on the road
   • a swap body cannot normally be stacked
   • a swap body weighs and costs less than an ISO container.

7. However, in both RID and ADR a swap-body is considered as a container and is treated as such in respect of placarding and marking.

8. Swap-bodies are not as suitable for sea transport as the ISO containers are, so swap-bodies are mainly used for transhipment between road and rail transport.

9. RID has similar requirements as the IMDG Code in respect of placarding and marking of containers. But there are differences – e.g. placard resistance to immersion in the sea and if a container contains only one type of dangerous goods and this weighs more than four tonnes, the UN number of this material must be shown on all four sides. Also the placarding provisions for semi-trailers do not seem to be harmonised.

10. So there are no real arguments to prioritise harmonisation with the IMDG Code and treat a swap-body as a container in all respects.

11. In document OTIF/RID/CE/2011/4, Switzerland has expressed its view on the placarding of wagons. Switzerland proposes a regulation similar to the situation for piggyback transport, i.e. the user may decide whether placards or orange-coloured plates are required on the wagon.

12. At transhipment locations, extra work loads and costs will arise when cargo transport units or wagons have to be additionally marked and placarded to fulfil more stringent regulations.

13. It is not only transport companies that benefit from harmonised placarding and marking provisions. Emergency services can respond more rapidly and take appropriate action if cargo transport units are marked and placarded alike.

14. As a consequence, in Notes to 5.3.1.2, 5.3.1.3 and 5.3.1.5, ADR excludes placarding requirements for swap-bodies and vehicles carrying swap-bodies containing packaged goods, except goods of classes 1 and 7.
General considerations

15. It is proposed that similarly to ADR a swap-body itself shall not be treated as a container in respect of placarding. It is suggested that the provisions for the placarding of swap bodies and wagons carrying swap bodies should be more similar to the provisions for placarding and marking for piggyback transport.

Proposals

16. In 1.1.4, insert the following new text::

"1.1.4.x  Placarding of swap bodies carried in a transport chain including road transport

1.1.4.x.1 Packaged dangerous goods may be carried in swap bodies under the following conditions:

Swap bodies and their content handed over for transport shall meet the provisions of ADR.

1.1.4.x.2 Placards, markings or orange-coloured plates on wagons carrying swap bodies

It is not necessary to affix placards, markings or orange-coloured plates to the carrying wagon in the following cases:

(a) when swap bodies bear the placards, markings or orange-coloured plates in accordance with chapters 5.3 or 3.4 of ADR;

(b) when placards, markings or orange-coloured plates are not required for the swap body (e.g. in accordance with 1.1.3.6 of ADR).

However, if wagons carrying multiple swap bodies with two or more dangerous goods are to be placarded, the appropriate placards shall be displayed on each side of the wagon at the position of the relevant swap body. In such a case, if all swap bodies bear the same placards, these placards need only be displayed once on each side of the wagon. If the same swap body bears more than one placard, these placards shall be displayed on the wagon adjacent to each other.

1.1.4.x.3 Carriage of swap bodies carrying packages

If a swap body becomes separated from its road vehicle, orange-coloured plates in accordance with Chapter 5.3 of ADR shall be affixed to the front and to the rear of the swap body or the corresponding placards shall also be affixed to both sides of the swap body.

1.1.4.x.4 Information in the transport document

For the carriage of swap bodies in accordance with this sub-section, the following shall be entered in the transport document:

"CARRIAGE IN ACCORDANCE WITH 1.1.4.x".

1.1.4.x.5 All the other provisions of RID remain unaffected."
This proposal also requires amendments to Annex A of ADR. See Appendix 1 for further information.

**Justification**

17. This proposal will facilitate multimodal land transport, differences in marking and placarding between ADR and RID will be reduced and harmonisation between land and sea transport modes will still have been considered.
ADR amendments

5.3.1.2 Placarding of containers, MEGCs, tank-containers and portable tanks

**NOTE:** This sub-section does not apply to swap bodies, except tank swap bodies or swap bodies carried in combined road/rail transport.

The placards shall be affixed to both sides and at each end of the container, MEGC, tank-container or portable tank. However, when swap bodies loaded with packages are carried in combined road/rail transport the placards need only be affixed to both sides if not marked according to 5.3.2.1.x.

When the tank-container or portable tank has multiple compartments and carries two or more dangerous goods, the appropriate placards shall be displayed along each side at the position of the relevant compartments and one placard of each model shown on each side at both ends.

5.3.1.3 Placarding of vehicles carrying containers, MEGCs, tank-containers or portable tanks

**NOTE:** This sub-section does not apply to the placarding of vehicles carrying swap bodies other than tank swap bodies or swap bodies carried in combined road/rail transport; for such vehicles, see 5.3.1.5.

If the placards affixed to the containers, MEGCs, tank-containers or portable tanks are not visible from outside the carrying vehicles, the same placards shall also be affixed to both sides and at the rear of the vehicle. Otherwise, no placard need be affixed on the carrying vehicle.

5.3.1.5 Placarding of vehicles carrying packages only

**NOTE:** This sub-section applies also to vehicles carrying swap bodies loaded with packages, except for combined road/rail transport; for combined road/rail transport, see 5.3.1.2 and 5.3.1.3.

5.3.1.5.1 For vehicles carrying packages containing substances or articles of Class 1 (other than of Division 1.4, compatibility group S), placards shall be affixed to both sides and at the rear of the vehicle.

5.3.1.5.2 For vehicles carrying radioactive material of Class 7 in packagings or IBCs (other than excepted packages), placards shall be affixed to both sides and at the rear of the vehicle.

5.3.2.1 Insert a new paragraph to read as follows:

"5.3.2.1.x If a swap body containing packaged dangerous goods in combined road/rail transport is detached from its vehicle during the carriage of dangerous goods, orange-coloured plates shall be affixed to the front and the rear of the swap body or placards according to sub-section 5.3.1.2 shall be affixed."