

OTIF



**ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBAHNVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-
NATIONAL CARRIAGE BY RAIL**

OTIF/RID/CE/2012/1

28 March 2012

Original: French

**RID: 51st Session of the Committee of Experts on the Transport of Dangerous Goods
(Berne, 30 and 31 May 2012)**

Subject: Placarding of wagons carrying packages only, in accordance with 5.3.1.5

Proposal transmitted by Switzerland

Related documents: OTIF/RID/CE/2008/17
OTIF/RID/CE/2010/18
OTIF/RID/CE/2011/4
Final report of the 49th session of the RID Committee of Experts, paras.
21 to 29
Final report of the 50th session of the RID Committee of Experts, paras.
36 to 38

Introduction

1. At the 50th session of the RID Committee of Experts in Malmö, Switzerland submitted document OTIF/RID/CE/2011/4, part of which is reproduced below. The aim of this document was to start a discussion on the advantages and disadvantages of harmonising RID with ADR by allowing placards to be replaced by orange-coloured plates on wagons carrying packages. The summary of the discussion (paragraphs 36 to 38 of report OTIF/RID/CE/2011-A) reveals different opinions, with criticism focusing mainly on the loss of information for the emergency services and railway personnel. The representative of Switzerland was asked to submit an official proposal taking account of this aspect and examining how the provision relating to the protective distance in 7.5.3 can be applied.

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.

2. The RID Committee of Experts took a step towards simplifying the rules on placarding and marking between the road and rail modes. New provisions relating to piggyback transport were introduced into the 2011 edition of RID: 1.1.4.4.2 no longer requires that the carrying wagon be placarded or marked when transport units or trailers bear the placards, markings or orange-coloured plates in accordance with chapters 5.3 or 3.4 of ADR.
3. A working group hosted by UIC was the origin of these new provisions, which were adopted at the 47th session of the RID Committee of Experts in Sofia in November 2009. The report of this working group had been submitted to the 46th session of the RID Committee of Experts (Hamburg, October 2008) in document OTIF/RID/CE/2008/17. To support the proposal no longer to require placarding on carrying wagons, paragraph 13 of this document says: “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.”
4. What is the situation with regard to wagons containing packages? If the principle of ADR marking is considered acceptable in piggyback transport, as it is simpler to apply and is considered equivalent from the point of view of indicating the danger, why not do the same for wagons containing packages? That is the aim of this proposal.
5. In its document OTIF/RID/CE/2010/18 at the 49th session of the RID Committee of Experts (Luxembourg, November 2010), Sweden pointed out that for the carriage of packages, the wagon has to bear placards indicating the substances packed, while in piggyback transport, orange plates affixed to road vehicles are considered sufficient. Switzerland shares the view expressed in paragraph 5 of the document, which says that “freight wagons could be marked and placarded in the same way”.
6. Adequate instructions for railway personnel in the event of an accident could be worded in a very general manner: bearing in mind all the characteristics of hazards, the reasonable thing to do would be to move away and to take shelter until the emergency services arrive. The safety instructions in 5.4.3 do not define any particular conduct for each class of dangerous goods. All that is important to know is whether a wagon carrying packages is also carrying any dangerous goods.
7. The provision concerning the protective distance in 7.5.3 will be applied restrictively: the presence of an orange-coloured plate on a wagon is a condition for providing a protective distance.

Current situation

8. Placarding:
 - ADR: vehicles carrying packages are exempt from placarding (5.3.1.5). Vehicles carrying packages of Class 1 or Class 7 are an exception.
 - RID: placarding on both sides of the wagon is obligatory for all classes (5.3.1.5).

Orange-coloured marking:

- ADR: orange-coloured rectangular plates are prescribed on the front and rear of vehicles carrying packages (5.3.2.1.1). Special rules apply to solids, unpackaged articles and radioactive material (5.3.2.1.4).
- RID: no orange-coloured marking is prescribed on wagons containing packages. Special rules apply to radioactive material (5.3.2.1.1).

Proposal

9. Leave it up to the user to indicate the danger of wagons carrying packages:

- by means of placards (unchanged)

or

- by affixing orange-coloured rectangular plates to both sides of the wagon (new, harmonises with ADR).

10. Amend 5.3.1.5 as follows (new text underlined):

"5.3.1.5 Placarding of wagons carrying packages only

Placards shall be affixed to both sides.

Instead of placards, orange-coloured plates conforming to 5.3.2.2.1 may be affixed to both sides.

5.3.1.5.1 For wagons carrying packages containing substances or articles of Class 1 (other than those of Division 1.4, compatibility group S) placards shall be affixed to both sides.

5.3.1.5.2 For wagons carrying radioactive material of Class 7 in packagings or IBCs (other than excepted packages) placards shall be affixed to both sides."

11. Amend the first paragraph of 7.5.3 as follows (new text underlined):

"Every wagon or large container containing substances or articles of Class 1 and bearing a label conforming to models Nos. 1, 1.5 or 1.6, shall be separated on the same train from wagons or large containers bearing a label conforming to models Nos. 2.1, 3, 4.1, 4.2, 4.3, 5.1 or 5.2, or orange-coloured plates, by a protective distance."

Justification

12. A loader has requested the Federal Office for Transport to be able to derogate from the requirement in 5.3.1.5 to affix placards to both sides of wagons carrying packages and to affix orange-coloured plates instead.

13. The national Swiss fire brigade association, which was consulted on this matter, supported the proposal to introduce the use of folding orange-coloured plates, saying that this would improve the safety of the emergency services:

- there is a positive analogy with the marking of road vehicles,
- the marking of dangerous goods is better ensured by folding orange-coloured plates attached firmly to the wagon than by placards which peel off or which can no longer be removed.

14. After careful examination of the question and consultation with the sectors concerned, a request for a derogation on national territory was granted in June 2009. So far, eight Swiss companies benefit from the derogation authorised by the Federal Office for Transport. No difficulties in implementing this have been notified.

15. The Federal Office for Transport is preparing a revision of the Swiss Transport of Dangerous Goods by Rail Act and intends to introduce the provisions of this derogation into the Act for transport on national territory.
16. The placarding of wagons gives rise to a number of problems which entail costs and a reduction in safety (see photos attached):
 - the placard sticks on badly and peels off (low temperature, wet surface, etc.),
 - the placard sticks on too well and is difficult to remove when the wagon is empty.
17. Orange-coloured marking, e.g. using a folding panel, is simpler to use. This would put rail transport on an equal footing with road transport by getting rid of one factor that reduces its competitiveness.
18. The railway infrastructure manager is still required (together with the carrier) to ensure that he has rapid and unrestricted access to the information in accordance with 1.4.3.6, particularly the UN numbers of the goods carried in each wagon. In road transport though, these pieces of information are not necessarily available rapidly in the event of an accident (driver may be injured, documents kept in the driver's cab which is inaccessible or has been destroyed, etc.).

Notes by the Secretariat:

1. If this proposal is adopted, further amendments to 5.3.2 will be necessary, as in contrast to ADR, this section does not currently allow for orange-coloured plates without the hazard identification number and UN number.
2. The amended 7.5.3 would have to be restricted to orange-coloured plates with no hazard identification number and no UN number, because otherwise the amendment would mean that a protective distance would have to be maintained from all dangerous goods tank-wagons or wagons carrying dangerous goods in bulk.

