



ORGANISATION INTERGOUVERNEMENTALE POUR LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

ZWISCHENSTAATLICHE ORGANISATION FÜR DEN INTERNATIONALEN EISENBAHNVERKEHR

INTERGOVERNMENTAL ORGANISATION FOR INTERNATIONAL CARRIAGE BY RAIL

INF.11

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Original: German

RID: 51st Session of the Committee of Experts on the Transport of Dangerous Goods

(Berne, 30 and 31 May 2012)

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

Comments by the International Union of Railways (UIC) on document OTIF/RID/CE/2012/1 transmitted by Switzerland

Evaluation of the document

UIC rejects Switzerland's proposal for the following reasons:

- 1. The document states that the Swiss proposal concerns a national requirement needed by several carriers in Switzerland, which is supported by the national Swiss fire brigade association. From UIC's point of view, there is no obvious market requirement for an international regulation in RID.
- 2. UIC does not understand the safety gain quoted in paragraph 13, as the placarding of wagons would enable the risks inherent in the packages to be indicated more specifically than an orange-coloured plate without the hazard identification number and UN number.
- 3. The proposed amendments would lead to additional expenditure and costs in terms of the marshalling of trains, as henceforth, all wagons with orange-coloured plates would have to be taken into consideration in terms of a protective distance regulation (including wagons loaded with packages only and showing no hazard label for 2.1, 3, 4.1, 4.2, 4.3, 5.1 or 5.2).
- 4. Whether a wagon loaded with packages is marked with a blank orange-coloured plate or with placards cannot be determined from the declarations in the transport document (hazard label declaration). As a result, telematics applications, such as the provision of information to the

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INF.11

EDP systems of the production, which is necessary for marshalling, would be complicated or impossible.