

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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RID: 1st Session of the RID Committee of Experts' standing working group
(Riga, 12 – 15 November 2012)

Subject: 5.3.1.7.4 – Size of placards on wagons

Proposal transmitted by Sweden

Summary: Discussion document on the placarding of rail wagons.

Decision to be taken: Amend certain provisions in RID so that the provisions in 5.3.1.7.1 and 5.3.7.4 do not contradict each other.

Related document: OTIF/RID/CE/2011/10 and INF.11 from the 50th session of the RID Committee of Experts
Report OTIF/RID/CE/2011-A from the 50th session, paragraphs 39 to 43
Report OTIF/RID/CE/2011-A from 51st session, paragraphs 18 to 20,
Document ECE/TRANS/WP.15/AC.1/2011/8,
Report TRANS/WP.15/AC.1/122 (OTIF/RID/RC/2011-A) from the Joint Meeting in March 2011, paragraphs 40-41.

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.

Background

1. RID 5.3.1.7.4 allows the unconditional possibility of reducing the size of placards. With the exception for Class 7 placards it is always allowed to affix small (15 x 15 cm) placards on rail wagons instead of 25 x 25 cm placards. Sweden believes this possibility should be limited and conditions for the use of small placards should be introduced in RID.
2. At the Joint Meeting in spring 2011, Sweden proposed that it would be advantageous if conditions for affixing smaller markings could be harmonised for the inland transport of dangerous goods, and preferably for all kinds of placarding and marking. Report TRANS/WP.15/AC.1/122 (OTIF/RID/RC/2011-A), paragraph 40, says: "Several delegations were not in favour of the proposal by Sweden. ADR, unlike RID, did not require the use of placards for the carriage in packages of substances other than those of Class 1 and Class 7. It was therefore unnecessary to specifically harmonize conditions for affixing smaller markings. In addition, the marking indicating limited quantities was only required for loads exceeding 8 tonnes; there was apparently no need to reduce the size of the placards or markings affixed to large vehicles or wagons."
3. At the 50th and 51st sessions of the RID Committee of Experts, Sweden proposed amendments to 5.3.1.7.4. However, no result was achieved. From the report of the last RID Committee of Experts meeting, it was concluded that in 5.3.1.7.4, the possibility of reducing the dimensions of the placards should either be linked to the surface area available on the wagons, or should be completely deleted. The expert from Sweden said he would submit a revised document to the next meeting in Riga.

Summary of discussions at the RID Committee of Experts

4. The main problem expressed by some Contracting States was that enforcement personnel are not able to decide whether or not there is sufficient *surface* area available on a wagon to affix 25 x 25 cm placards. New provisions should therefore be included to explain more precisely whether to affix small or large placards. Other Contracting States said there is always sufficient space to affix large placards on rail wagons and 5.3.1.7.4 could therefore be deleted. It therefore appears that there are two contradictory opinions. However, many Contracting States said they could support the proposal from Sweden, but with a transitional measure.

Introduction to a continued discussion

5. Different types of wagons

Placards must be affixed to wagons carrying large containers, MEGCs, tank-containers or portable tanks. Normally, these items are already placarded and wagons only need to be placarded when the placards are not visible. In informal document INF.11 to the 50th RID Committee of Experts meeting, Switzerland supported the Swedish proposal, especially for tank-wagons.

6. Placards must also be affixed to bulk-wagons, tank-wagons, battery-wagons and wagons with demountable tanks. Normally, there is surface area available on these wagons to affix placards. For these wagons there is a requirement to affix placards adjacent to each other.

(Is it possible that the different wordings for "adjacent"/"next to" in RID e.g. 5.2.1.8.2, 5.2.2.1.6 and 5.3.1.4 can be harmonised, or is there a difference? Compare

5.2.1.8.2: next to; neben; à côté

5.2.2.1.6: adjacent; nahe; à côté

5.3.1.4: adjacent; nahe; à côté)



Bulk wagon

7. Then there are wagons carrying packages. These wagons can be closed, open or sheeted. On closed wagons there is normally plenty of space to affix large placards.



Closed wagon

8. Open and sheeted wagons can be more difficult to placard. On high-sided open wagons there is space for large placards, but flat wagons may need special panels for the placards to be mounted on similar to road vehicles.



Flat wagon



High-sided open wagon

9. If an available surface area is to be defined in RID it also has to refer to the number of placards required. This could be difficult to specify. For flat wagons it could be discussed whether large or small placards should be affixed.



Small wagon

Problems in affixing and removing placards

10. It can be difficult to affix placards to surfaces that are not flat e.g. on containers. However, this will also affect the possibility of affixing both small and large placards. Therefore, the area on the wagon panel can be used as far as possible. According to UIC, placards may be affixed either to the wagon panel and/or to other areas on the sides of the wagon.

RID Contracting States' own decisions

11. The expert from Sweden does not know how RID Contracting States handle the problem with two different sizes of placards and who decides, and on what grounds, which of the two sizes may be used. If a Contracting State allows both sizes, someone must have decided criteria on when to use the large or small placards, or this State has determined that either size may be affixed, in line with the requirements in RID.
12. As the provisions stand in RID today, the enforcement body in Sweden has to accept smaller placards even if there is space for large ones.

Transitional measure

13. Some countries wanted a transitional period before new requirements entered into force. This would seem to be a pertinent requirement.

Safety arguments

14. The safety arguments are often heard in discussions. However, it seems of little benefit to safety if all placards, other than Class 7, may be reduced in size without any conditions. A large placard has an area that is almost 300 % larger than a small placard.

Other transport modes

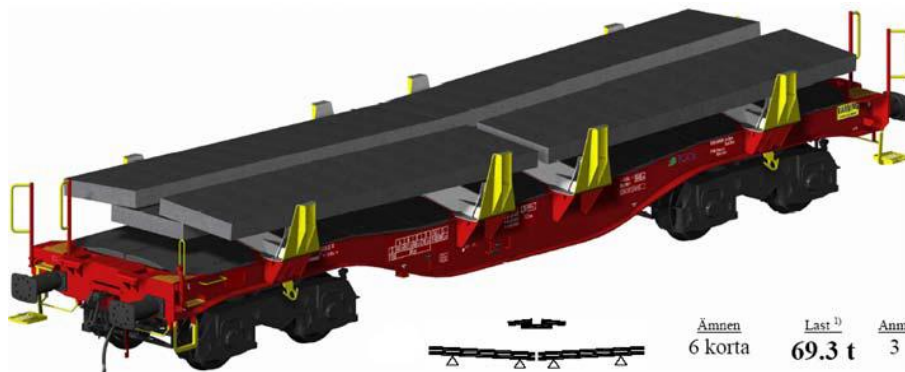
15. In the IMDG Code the general rule is 25 x 25 cm placards. In the case of a vehicle without sides, the placards may be affixed directly to the cargo-carrying unit, provided they are readily visible. In the case of vehicles which have insufficient area to allow the fixing of larger placards, the dimensions of the placard may be reduced to 10 x 10 cm.

Training

16. It appears from previous discussions that other reasons, e.g. the prerequisite for enforcement personnel to judge available surface area, are of more importance than safety. There are several places in RID, including Chapter 5, e.g. 5.2.1.8.3 (an example very similar to the one discussed) and also in 5.1.2.1 and 5.2.1.2, where the word "readily" is used and enforcement personnel have to decide if a provision is met or not. This is a normal procedure for enforcement personnel, sometimes in cooperation with the competent authority, for assessing whether a provision is met or not. Training of personnel is a basic tool to help them in their task.
17. The importance of training competent authorities was also pointed out at the round table at the seventy-third session of the Inland Transport Committee as being an important safety and security factor, and more effort should be made to ensure the availability of expertise in governmental administrations and the training of all participants in the transport of dangerous goods chain.
18. On the basis of the ITC discussions, WP.15 concluded at its ninetieth session that "in the next biennium the Working Party might plan to extend the scope of training for which provision was made by ADR to include the competent authorities, in particular inspection authorities."
19. Perhaps the RID working group also should consider such an arrangement for the enforcement bodies. This could help enforcement personnel to take the correct decisions.

Marking of wagons

20. In addition to placards, wagons sometimes need to be marked, e.g. for elevated temperature substances. This mark may not be reduced in size. Therefore, rail wagons always seem to have sufficient surface area for elevated temperature marks.



Transport of UN 3258 Elevated temperature solids, n.o.s.

21. The environmentally hazardous substances mark must be 10 x 10 cm. However, it is not clear whether the last sentence of RID 5.3.6 gives the requirement to increase the size of this mark to the size of placards i.e. 15 x 15 or 25 x 25 cm. This topic is to be discussed separately.
22. A comparison with the provisions in 3.4.15 shows that for limited quantities, there is no possibility of reducing the size of the LQ-marking on wagons/vehicles. The minimum dimension must be 25 x 25 cm. The space seems to be available in this case.
23. According to ADR, orange-coloured plates may be reduced in size to 12 x 30 cm under certain conditions. This possibility does not exist in RID, perhaps due to the size of a rail wagon. Therefore, rail wagons always seem to have sufficient surface area for full-size orange-coloured plate markings.

Proposals

24. The expert from Sweden has also made some proposals as extra input to the discussions.

Proposal 1

25. Replace the text in 5.3.1.7.4 with the following text:

"5.3.1.7.4 If the size and construction of the wagon is such that the available surface area is insufficient to affix the prescribed placards, their dimensions may be reduced to 150 mm by 150 mm. In this case, the other dimensions prescribed for the symbol, lines, figures and letters do not apply."

New text underlined. (This new text is copied from ADR 5.3.2.2.1, second indent)

Proposal 2

26. Delete 5.3.1.7.4.

(If 5.3.1.7.4 is deleted, there is no longer any contradiction between 5.3.1.7.1 and 5.3.1.7.4 and only 25 x 25 cm placards are allowed.)

Proposal 3

27. Amend the text in sub-section 5.3.1.7.4 to read as follows:

"5.3.1.7.4 The dimensions of the placards to be affixed to open wagons and sheeted wagons may be reduced to 150 mm by 150 mm. In this case, the other dimensions prescribed for the symbol, lines, figures and letters do not apply."

New text underlined. (This proposal allows smaller placards to be affixed to open and sheeted wagons only, still without any conditions. It makes it easy for the enforcement bodies to decide whether 15 x 15 or 25 x 25 cm placards must be used. An alternative could be to refer to "wagons without sides", as in the IMDG-Code, but then the question as to what constitutes a side may arise.)

Proposal 4

28. Amend 5.3.1.7.1 to read as follows:

"5.3.1.7.1 Except as provided in 5.3.1.7.2 for the Class 7 placard, a placard shall:

- (a) Be not less than 150 mm by 150 mm and have a line 12.5 mm inside the edge and running parallel with it. In the upper half the line shall have the same colour as the symbol and in the lower half it shall have the same colour as the figure in the bottom corner;
- (b) Correspond to the label required for the dangerous goods in question with respect to colour and symbol (see 5.2.2.2); and
- (c) Display the numbers (and for goods of Class 1, the compatibility group letter) prescribed for the dangerous goods in question in 5.2.2.2 for the corresponding label, in digits not less than 25 mm high."

Delete 5.3.1.4. New text underlined. (This proposal removes the contradiction between 5.3.1.7.1 and 5.3.1.4. The proposal does not change anything compared with the present situation – 15 x 15 cm placards are always allowed.)

Proposal 5

29. Add a new transitional measure 1.6.1.x to read as follows:

"1.6.1.x Existing placards which meet the requirements of 5.3.1.7.4 applicable up to 31 December 2014 may continue to be used until 31 December 201X."

New text underlined.
