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Subject: Carriage in piggyback transport of road vehicles with dangerous goods carried
in a transport chain including maritime or air carriage

Proposal transmitted by Austria

Introduction

1. According to Chapter 5.3 of the IMDG Code, road vehicles carrying dangerous goods which are loaded on to the railways before or after being carried by ferry, and which are carried in piggyback transport, are often placarded and marked, at least on three sides – semi-trailers on all four sides – but no orange-coloured plates are affixed (see Annex).
2. Neither the special rules in 1.1.4.2 for carriage in a transport chain including maritime or air carriage, nor those for piggyback transport in 1.1.4.4 allow this marking alone:
 - 1.1.4.2 does not deal with the carriage of road vehicles in a transport chain;
 - 1.1.4.4.1 only allows the carriage of dangerous goods in piggyback transport if the transport units and trailers and their contents meet the provisions of ADR. This does include the provisions of ADR concerning the transport chain, but in the present case ADR 1.1.4.2.2 requires that the orange-coloured plates in accordance with ADR 5.3.2 be affixed.
3. If the trailers have orange-coloured folding panels, these must therefore be opened by the loading personnel or by other employees of the railways or combined transport companies. Other trailers have adhesive films which often get lost during transport and do not fully meet the provisions of ADR, because although they are orange, they are not plates.

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4. The marking and placards in accordance with Chapter 5.3 of the IMDG Code are more easily recognisable and provide more information than the orange-coloured plates that are required in addition. There is therefore no reason not to do without the latter for piggyback transport.
5. The special conditions for piggyback transport are brought together in 1.1.4.4. The rules affected by this contain information in the form of a Note (cf. 5.3.1.3, 5.3.2.1, 5.4.1.1.9, 7.7). It therefore makes sense to resolve this problem in the same way.
6. The provisions on the marking of carrying wagons in 1.1.4.4.2 have so far never taken account of ADR 1.1.4.2 and should be amended so that they do.

Proposals

7. **1.1.4.2** Insert the following Note after the heading:

“NOTE: For the carriage in piggyback transport of transport units and trailers carried in a transport chain, see 1.1.4.4.”

- 1.1.4.4.2** Amend (a) to read as follows (changes are underlined):

“(a) when transport units or trailers bear the placards, marks or orange-coloured plates in accordance with chapters 5.3 or 3.4 of ADR or the placards and marks in accordance with 1.1.4.2 of ADR;”.

- 1.1.4.4** Insert a new 1.1.4.4.5 as follows:

“1.1.4.4.5 By derogation from 1.1.4.4.1 to 1.1.4.4.4, for the carriage of transport units and trailers carried in a transport chain including maritime carriage and marked and bearing placards in accordance with Chapter 5.3 of the IMDG Code, the additional orange-coloured plates in accordance with 1.1.4.2.2 of ADR need not be affixed.”

1.1.4.4.5 and

1.1.4.4.6 become **1.1.4.4.6** and **1.1.4.4.7**.

- 5.4.1.1.9** Amend “1.1.4.4.5” to read:

“1.1.4.4.6”.



Semi-trailer with marking in accordance with the IMDG Code (placards on four sides).
At the rear, additional marking with orange-coloured plates is required!