



INF. 5

13 November 2015

(English only)

RID: 5th Session of the RID Committee of Experts' standing working group
(Zagreb, 23 - 27 November 2015)

Subject: Carriers' checks of LQ marked wagons

Transmitted by Sweden

Related documents: OTIF/RID/CE/GTP/2015/5 and OTIF/RID/CE/GTP/2015/9.

Background

1. For the carriage of limited quantities, UIC proposes similar documentation requirements as for excepted quantities in order for the carrier to check the limited quantities on board the train.
2. Sweden believes this proposal is a step in the right direction. However, we have taken 3 examples to illustrate the consequences with limited quantities alone or in combination with other dangerous goods. Sweden hopes the examples below show the problems when provisions are taken over directly from the harmonisation process without adapting them to other rail provisions.

Example 1

3. Wagon with limited quantities, less than 8 tonnes of UN 1170 Ethanol, 3, III. In this case 1 500 5 litre plastic jerricans, i.e. 7 500 kg LQ.



- Information according to 3.4.12 states the following: "LQ 7 500 kg";
- No placarding of the wagon is required;
- No information to the driver is required;
- No information to the railway infrastructure manager is required;
- Staff at rail yards do not know that the wagon is carrying dangerous goods.

Example 2

4. Wagon with limited quantities, more than 8 tonnes UN 1170 Ethanol, 3, III. 5 600 5 litre plastic jerricans, i.e. 28 000 kg LQ.



- Information according to 3.4.12 states the following: "LQ 28 000 kg";
- LQ marking 250 x 250 mm is required on the wagon;
- No information to the driver is required;
- Information to the railway infrastructure manager that the wagon contains LQ is required;
- Staff at rail yards can note the presence of dangerous goods within the wagon but they cannot interpret the danger.

Example 3

5. Wagon with 1 drum of 60 kg, UN 3077 Environmentally hazardous substance, solid, n.o.s. 9, III, together with 5 600 5 litre plastic jerricans of UN 1170 Ethanol, 3, III, i.e. 28 000 kg LQ.



- The transport document states the following: "UN 3077 Environmentally hazardous substance, solid n.o.s., 9, III, 1 drum, 60 kg", information according to 3.4.12 states: "LQ 28 000 kg";
- Only placard according to model No. 9 is required on the wagon according to 3.4.13 (a);
- Information to the driver that the wagon contains UN 3077, placard 9 is required;

- Information to the railway infrastructure manager that the wagon contains UN 3077 is required;
- Staff at rail yards note that the wagon contains dangerous goods of Class 9 and nothing else.

Discussion

6. The UIC proposal deals with some of the problems with this kind of transport, but not all of them. The proposal for 1.4.3.6 is about the information for the railway infrastructure manager. The information from the consignor has also been improved and is more in line with the IMDG Code. However, Sweden does not see the need for any discussion or solution in terms of displaying different or even irrelevant hazards on wagons or containers.
 7. Commission Regulation No. 1158/2010 on a common safety method for assessing conformity with the requirements for obtaining railway safety certificates is valid for EU Member States. Annex II of the Regulation contains e.g. risk control measures for all risks associated with the activity of the railway undertaking and provisions for plans for action and alerts and information in case of an emergency. This Regulation is exclusively designed for rail transport, including the transport of dangerous goods by rail.
 8. A system that could improve safety and make it easier to comply with measures according to the Commission Regulation is desirable. If the hazards are not displayed on a wagon or if they are misleading, as in example 3 above, Sweden believes that existing requirements on safety management and supervision cannot be fulfilled.
-