



INF. 1

31 October 2022

Original: English

RID: 15th Session of the RID Committee of Experts' standing working group
(Berne/hybrid, 23 and 24 November 2022)

Subject: Placarding of containers, bulk containers, MEGCs, tank-containers and portable tanks

Proposal submitted by the International Association of Safety Advisers (IASA)

SUMMARY

Explanatory summary:

The heading of ADR 5.3.1.2 is as follows:

“Placarding of containers, bulk containers, MEGCs, tank-containers and portable tanks”. A Note also says that: “This sub-section does not apply to swap bodies, except tank swap bodies or swap bodies carried in combined road/rail transport.”

So it is clear that even if they are defined as a container, swap bodies are not subject to the general requirements for placarding, applicable to containers.

The issue is not as clear in RID. The heading of RID 5.3.1.2 is as follows:

“Placarding of large containers, bulk containers, MEGCs, tank-containers and portable tanks.” As the above Note is missing, this section should be extended to swap bodies as well, but reading the title, the impression given is that this section only applies to large containers. Reading these sentences, it seems that swap bodies are not covered by 5.3.1.2, so should be not placarded at all.

Decision to be taken:

After the heading of 5.3.1.2, insert a Note as follows:

“**NOTE:** This sub-section also applies to swap bodies.”

Introduction

1. The heading of ADR 5.3.1.2 is as follows:

“Placarding of containers, bulk containers, MEGCs, tank-containers and portable tanks”.

A Note also says that:

“This sub-section does not apply to swap bodies, except tank swap bodies or swap bodies carried in combined road/rail transport.”

So it is clear that even if they are defined as a container, swap bodies are not subject to the general requirements for placarding, applicable to containers.

2. The issue is not as clear in RID. The heading of RID 5.3.1.2 is as follows:

“Placarding of large containers, bulk containers, MEGCs, tank-containers and portable tanks.”

As the above Note is missing, this section should be extended to swap bodies as well, but reading the title, the impression given is that this section only applies to large containers.

In 1.2.1, large containers are defined as containers that are larger than a small container or as containers in the meaning of the CSC.

Reading these sentences, it seems that swap bodies are not covered by 5.3.1.2, so should be not placarded at all.

3. The problem is that swap bodies are defined as containers and not as large containers (see definition of “container” in 1.2.1). For tank swap bodies there is no problem as they are defined as tank-containers and therefore fall under 5.3.1.2. The origin of this problem dates back to the restructuring work in the 1990s, where it was decided for RID to exclude small containers from the scope of application of Chapter 5.3 and to include them in the scope of application of Chapter 5.2 (see Note to 5.2.2). The consequence of this decision was that only the term “large container” is used in RID Chapter 5.3, whereas in ADR the term “container” is used.

Proposal

4. IASA proposes to insert a Note after the heading of RID 5.3.1.2 to read as follows:

“**NOTE:** This sub-section also applies to swap bodies.”

Justification

5. Adding the Note to RID 5.3.1.2 makes clear that in RID, swap bodies must be dealt in the same manner as large containers
