Introduction

1. In informal document INF.1 submitted to the 15

   th session of the standing working group

   (23 and 24 November 2022), the International Association of Dangerous Goods Safety

   Advisers (IASA) was of the view that it was not clear from the provisions of RID which

   provisions governed the affixing of placards to swap bodies. This problem was caused by

   the definitions in 1.2.1, where swap bodies are defined as containers, but not as large

   containers.

2. The majority of the standing working group was of the view that the provisions of RID are

   sufficiently clear. The Secretariat of OTIF was asked to submit a text to the next session

   of the standing working group setting out a corresponding interpretation of RID that could

   be published on OTIF’s website once the standing working group had approved it (see

   report OTIF/RID/CE/GTP/2022-B, paragraphs 4 to 8).

Proposal

3. The Secretariat proposes that the following interpretation be published on OTIF’s website:
“5.3.1.2

Interpretation: 5.3.1.2 also applies to the affixing of placards to swap bodies.

Justification: Among other things, 5.3.1.2 governs the affixing of placards to large containers.

According to the definition of container in 1.2.1

– a large container is a container which does not meet the definition of a small container,

– a small container is a container which has an internal volume of not more than 3 m³ and

– a swap body is also a container, but it does not have any particular construction characteristics specific to land transport.

Consequently, as swap bodies are considered not only as containers, but as large containers because they have an internal volume of more than 3 m³, they are subject to the provisions of 5.3.1.2.”