RID: 50th Session of the Committee of Experts on the Transport of Dangerous Goods
(Malmö, 21 – 25 November 2011)

Subject: Placarding of wagons carrying packages only, in accordance with 5.3.1.5

Proposal transmitted by Switzerland

Related documents:
OTIF/RID/CE/2008/17
OTIF/RID/CE/2010/18
Final report of the 49th session of the RID Committee of Experts OTIF/RID/CE/2010-B, paras. 21 to 29

Introduction

1. New provisions for piggyback transport have been introduced into the 2011 edition of RID: 1.1.4.4.2 no longer requires placards or orange-coloured marking on the carrying wagon if the transport units or trailers have the placards, markings or orange-coloured plates in accordance with chapters 5.3 or 3.4 of ADR.

2. A working group hosted by UIC was the origin of these new provisions, which were adopted at the 47th session of the RID Committee of Experts in Sofia in November 2009. The report of this working group had been submitted to the 46th session of the RID Committee of Experts (Hamburg, October 2008) in document OTIF/RID/CE/2008/17. To support the proposal no longer to require placarding on carrying wagons, paragraph 13 of this document says: "The participants were of the view that the current provisions concerning the information on the transport operation, particularly RID 1.4.2.2.5 and 1.4.3.6, guaranteed that the emergency services had reliable access to useful information." Switzerland supports this statement.
3. By abolishing the marking of carrying wagons carrying vehicles placarded or marked in accordance with the applicable provisions of ADR, the RID Committee of Experts has taken a step towards simplifying the rules on placarding and orange-coloured marking between the road and rail modes.

4. What is the situation with regard to wagons containing packages? If the principle of ADR marking is considered acceptable in piggyback transport, as it is simpler to apply and is considered equivalent from the point of view of indicating the danger, why not do the same for wagons containing packages? That is the aim of this proposal.

5. In its document OTIF/RID/CE/2010/18 at the 49th session of the RID Committee of Experts (Luxembourg, November 2010), Sweden pointed out that for the carriage of packages, the wagon has to bear placards indicating the substances packed, while in piggyback transport, orange plates affixed to road vehicles are considered sufficient. Switzerland shares the view expressed in paragraph 5 of the Swedish document, which says that “freight wagons could be marked and placarded in the same way as trailers or transport units in piggyback transport”.

Current situation

6. Placarding:
   - ADR: vehicles carrying packages are exempt from placarding (5.3.1.5). Vehicles carrying packages of Class 1 or Class 7 are an exception.
   - RID: placarding on both sides of the wagon is obligatory for all classes (5.3.1.5).

Orange-coloured marking:
   - ADR: orange-coloured rectangular plates are prescribed on the front and rear of vehicles carrying packages (5.3.2.1.1). Special rules apply to solids, unpackaged articles and radioactive materials (5.3.2.1.4).
   - RID: no orange-coloured marking is prescribed on wagons containing packages. Special rules apply to radioactive materials (5.3.2.1.1).

Proposed solution

7. Leave it up to the user to indicate the danger of wagons carrying packages:
   - by means of placards (unchanged)

or

   - by affixing orange-coloured rectangular plates to both sides of the wagon (new, harmonises with ADR).

In this case:
   - The same special rules as in ADR (5.3.2.1.4) for solids, unpackaged articles and radioactive materials apply,
   - The orange-coloured plates must meet the conditions of 5.3.2.1.8, 5.3.2.2.1, 5.3.2.2.4 and 5.3.2.2.5.
Justification

8. A loader has requested the Federal Office for Transport to be able to derogate from the requirement in 5.3.1.5 to affix placards to both sides of wagons carrying packages and to affix orange-coloured plates instead. After careful examination of the question and consultation with the sectors concerned, a request for a derogation on national territory was granted in June 2009. No difficulties in implementing this have been notified. The national Swiss fire brigade association, which was consulted on this matter, supported the proposal to introduce the use of folding orange-coloured plates, saying that this would improve the safety of the emergency services:

- there is a positive analogy with the marking of road vehicles,
- the marking of dangerous goods is better ensured by folding orange-coloured plates attached firmly to the wagon than by placards which peel off or which can no longer be removed.

9. So far, eight Swiss companies benefit from the derogation authorised by the Federal Office for Transport.

10. The Federal Office for Transport is preparing a revision of the Swiss Transport of Dangerous Goods Act and intends to introduce the provisions of this derogation into the Act for transport on national territory.

11. The placarding of wagons gives rise to a number of problems (see photos):

- the placard sticks on badly and peels off (low temperature, wet surface, etc.),
- the placard sticks on too well and is difficult to remove when the wagon is empty.

12. Orange-coloured marking, e.g. using a folding panel, is simpler to use.

13. If the RID Committee of Experts supports the principle of this proposal, Switzerland could submit a draft text to a future session.