PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Section 5.3.2: General orange-coloured plate marking provisions

Comments from Germany and the OTIF Secretariat on informal document INF.15 (Sweden)

1. Reference is made to paragraph 3 of informal document INF.15.

2. At the 46th RID Committee of Experts meeting the majority supported the core of an informal working group proposal to accept in piggyback transport the markings used in road transport without modification instead of repeating the marking on the sides of the carrying wagon.

3. However, in the discussion it was highlighted that in cases when a trailer or semi-trailer is loaded without a drawing vehicle, only the orange-coloured marking on the end of the trailer is still visible. The RID Committee of Experts expressed doubts that this could be considered as marking in accordance with ADR and that it was sufficient for piggyback transport.

4. This consideration of the RID Committee of Experts led to the additional requirement to affix orange-coloured plates to the front of the trailer if a trailer becomes separated from its tractor unit.

5. Germany and the OTIF secretariat therefore welcome the informal document from Sweden to require orange-coloured plates on the front of trailers when not attached to a motor vehicle as this requirement will facilitate the work on combined transport terminals and avoid additional marking when loading trailers on carrying wagons.