Proposals for amendments to RID/ADR/ADN: new proposals

Item 5 (b) of the provisional agenda

Bern, 21–25 March 2011

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Inland Transport Committee


Excluding tanks, containers etc.

1. This document only deals with the marking and placarding of vehicles and wagons, excluding tanks, containers etc.

1 In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para.106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

Background

2. At the 49th session of the RID Committee of Experts, the International Union of Railways (UIC) submitted a proposal on affixing smaller limited quantities markings (LQ-markings) to railway wagons.

3. Sweden is in favour of the possibility of reducing the LQ-markings on railway wagons due to constructional reasons. However, Sweden is of the opinion that this issue of smaller LQ-marking should not only be valid for rail transport but also for road transport. Of course, it could be argued that for a transport unit with a maximum mass exceeding 12 tonnes there should be enough space for a marking of at least 250 mm by 250 mm, and the same for railway wagons. Nevertheless, there could be situations where the space, due to construction, is not available e.g. on an open vehicle without load compartment.

4. Furthermore, it would be advantageous if conditions for affixing smaller markings could be harmonised for inland transport, and preferably for all kinds of placardings and markings.

5. The same argument, as for LQ-marking, could be used concerning reducing the size of the environmentally hazardous substance mark. Such dangerous goods can also be transported in small vehicles similar to the transports that take place for Class 1 and 7, where the placards may be reduced according to sub-section 5.3.1.7.4. In RID and ADN, the possibility of reducing the size of the environmentally hazardous mark is already taken care of, since the provisions in RID allow for all placards to be reduced in size, and in RID the environmentally hazardous mark is treated as a placard.

6. Since the provisions in ADR only prescribe that the size of placards may be reduced for vehicles carrying Class 1 and 7, more harmonised provisions are desirable.

7. The provisions for marking and placarding already seem to have diverged between the regulations for inland transport. Therefore, it is at this stage difficult to propose completely harmonized amendments to these regulations.

8. If proposal 2 concerning reduction of size on placards is adopted, proposal 3 is no longer needed and can be withdrawn.

9. No proposal has been made for the elevated temperature marking since we have not heard any problem with that. But if needed a similar text as in proposal 3 can be prepared.

Proposal

10. Proposal 1, LQ-marking
   Add a second sentence in sub-section 3.4.15 to read as follows:
   "If the size and construction of the vehicle/wagon are such that the available surface area is insufficient to affix the prescribed marking, its dimensions may be reduced to 150 mm x 150 mm."

11. Proposal 2, Placards
   Replace the text in sub-section 5.3.1.7.4 with the following text:
"The dimensions of the placards to be affixed to vehicles/wagons may be reduced to
- 150 mm x 150 mm,
- 100 mm x 100 mm for Class 1 and 7 (ADR only)

if the size and construction of the vehicle/wagon are such that the available surface
area is insufficient to affix the prescribed placards. In this case, the other dimensions
prescribed for the symbol, lines, figures and letters do not apply."

12. **Proposal 3, Environmentally hazardous substance mark**

Add a new second paragraph in section 5.3.6 to read as follows:

"If the size and construction of the vehicle/wagon is such that the available surface
area is insufficient to affix the prescribed marking, its dimensions may be reduced to
150 mm x 150 mm."

**Justification**

13. The proposal does not change the current situation in any significant way and no
adverse effects on safety are to be expected. Instead the regulations for inland transport of
dangerous goods will be more harmonised.
Annex

Overview of current provisions regulating the size of different placardings and markings on vehicles/wagons

<table>
<thead>
<tr>
<th></th>
<th>ADR</th>
<th>RID</th>
<th>ADN</th>
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</thead>
<tbody>
<tr>
<td>Placards</td>
<td>The size shall be at least 250 mm by 250 mm</td>
<td>For all Classes the size of placards affixed to wagons may be reduced to 150 mm by 150 mm, unconditionally</td>
<td>For Classes 1 and 7 the size may be reduced to 100 mm by 100 mm (vehicles) and 150 mm by 150 mm (wagons) if available surface area is insufficient to affix the placard. Valid also for tank transport</td>
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<tr>
<td></td>
<td>For Classes 1 and 7 the size may be reduced to 100 mm by 100 mm if available surface area on the vehicle is insufficient to affix the placard. Valid also for tank transport</td>
<td>Indelible danger markings referred to in 5.2.2.1.2 shall apply</td>
<td>(For small tanks and containers the size may be reduced to 100 mm by 100 mm, unconditionally)</td>
</tr>
<tr>
<td>Environmentally hazardous mark</td>
<td>The mark shall be treated as a placard and may not be reduced in size</td>
<td>The mark shall be treated as a placard and may be reduced in size</td>
<td>The mark shall be treated as a placard and may be reduced in size for wagons but not for vehicles</td>
</tr>
<tr>
<td>LQ-mark</td>
<td>The size shall be at least 250 mm by 250 mm</td>
<td>It shall have sides of at least 250 mm</td>
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<tr>
<td>Elevated temperature mark</td>
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<tr>
<td>Warning mark for fumigated cargo</td>
<td>The size shall be at least 250 mm high by 300 mm wide</td>
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