Interpretation of the reduced dimensions of orange-coloured plates in 5.3.2.2.1

Transmitted by the Government of Hungary

1. Hungarian associations of road hauliers and DGSA-s asked the Hungarian competent authority about the proper interpretation of the provisions of 5.3.2.2.1. The reason for this question was that Hungarian carriers had experienced interpretations different from the Hungarian version in other ADR Contracting Parties.

2. The provision in question is in the first sentence of the second paragraph of 5.3.2.2.1, underlined in the English and French texts below:

“5.3.2.2.1 The orange-coloured plates shall be reflectorized and shall be of 40 cm base and of 30 cm high; they shall have a black border of 15 mm wide. The material used shall be weather-resistant and ensure durable marking. The plate shall not become detached from its mount in the event of 15 minutes’ engulfment in fire. It shall remain affixed irrespective of the orientation of the vehicle. The orange-coloured plates may be separated in their middle with a black horizontal line of 15 mm thickness.

If the size and construction of the vehicle are such that the available surface area is insufficient to affix these orange-coloured plates, their dimensions may be reduced to 300 mm for the base, 120 mm for the height and 10 mm for the black border. In that case, for a packaged radioactive material carried under exclusive use, only the UN number is required, and the size of the digits stipulated in 5.3.2.2.2 may be reduced to 65 mm in height and 10 mm in stroke thickness.

5.3.2.2.1 Les panneaux orange doivent être rétroéclatants et avoir une base de 40 cm et une hauteur de 30 cm ; ils doivent porter un liseré noir de 15 mm. Le matériau utilisé doit être résistant aux intempéries et garantir une signalisation durable. Le panneau ne doit pas se détacher de sa fixation après un incendie d'une durée de 15 minutes. Il doit rester apposé quelle que soit l'orientation du véhicule. Les panneaux orange peuvent présenter au milieu une ligne noire horizontale avec une largeur de trait de 15 mm.

Si la taille et la construction du véhicule sont telles que la surface disponible est insuffisante pour fixer ces panneaux orange, leurs dimensions peuvent être ramenées à 300 mm pour la base, 120 mm pour la hauteur et 10 mm pour le liseré noir. Dans ce cas, pour une matière radioactive emballée transportée sous utilisation exclusive, seul le numéro ONU est nécessaire et la taille des chiffres prévue au 5.3.2.2.2 peut être réduite à 65 mm de haut et 10 mm d'épaisseur.”
3. The Hungarian text of ADR reflects our interpretation i.e. the „standard” size of the orange-coloured plate is 400 mm base and 300 mm height, and the „minimum” permitted size is 300 mm base and 120 mm height. In our opinion several dimensions between the „standard” and the „minimum” dimensions are acceptable. If the size and construction of the vehicle are such that the available surface area is insufficient for the prescribed „standard” plate, a reduced plate e.g. of 300 mm base and 200 mm height is also permitted. According to our information in certain Contracting Parties the reduced dimensions permitted are only 300 mm for the base and 120 mm for the height.

4. Hungary can accept this interpretation if it was the original intention, nevertheless we think that the Hungarian text reflects a more practical approach. In order to have a clear and common interpretation of this provision, we would like to ask the Working Party the express views on the following questions:

- Which is the correct interpretation of the reduced dimensions?
- Shall the (reduced) orange-coloured plates be of the same size at the front and the rear of the vehicle?