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Item 5 (b) of the provisional agenda

**Proposals for amendments to Annexes A and B of ADR:
miscellaneous proposals**

Proposal of corrections to 5.3.2.1.4 and 5.3.2.1.6

Transmitted by the Government of Austria*

Summary

Executive summary:

5.3.2.1.4: The term “transport units” could imply a formally correct marking, which is in contrast to the intention of this paragraph. One can eliminate this, by replacing “transport units” by the term “vehicles”.

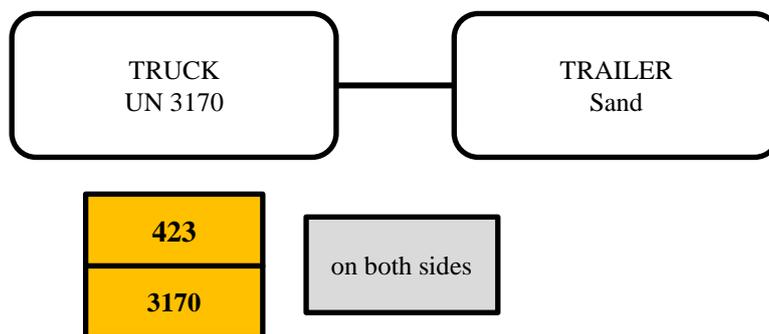
5.3.2.1.6: A more detailed description of the expression “dangerous substance and no non-dangerous substance” can help to prevent possible misinterpretations of this paragraph.

* In accordance with the programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/2016/28/Add.1 (9.1)).

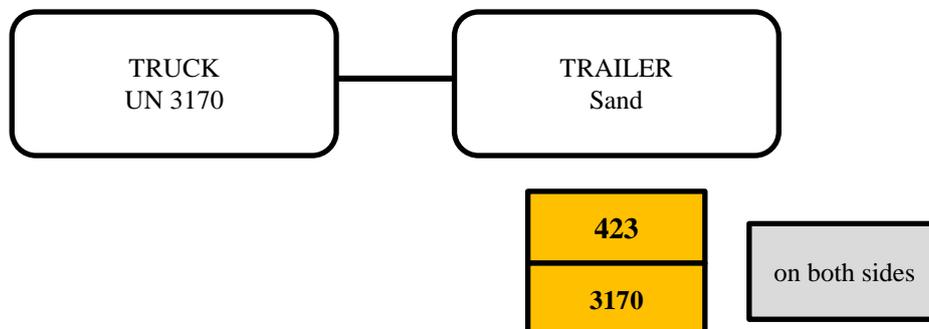
Introduction

5.3.2.1.4

1. This paragraph demands an orange-coloured plate (left side and right side), bearing the hazard identification number and the UN-number, if dangerous solids, articles (unpacked) or radioactive material under exclusive use (single UN-number) are carried.
2. The following example demonstrates the problem, which is addressed in the summary. A transport unit (a truck with trailer) is loaded with UN 3170 (bulk, in accordance with VC1 and AP2 – truck) and with a non-dangerous good (e.g. sand – trailer).
3. The marking in accordance with 5.3.2.1.4 is:



4. The other possibility – which is not in contradiction to 5.3.2.1.4, because only the transport of other dangerous goods is excluded, and the transport unit has to display the orange-coloured plates – is shown below:



5. The second possibility is certainly not intended by 5.3.2.1.4.

Sub-chapter 5.3.2.1.6

6. This paragraph allows a simplified orange-coloured plate marking of transport units under special circumstances:
 - a) The marking is required for
 - i) tank-vehicles, battery-vehicles ... (5.3.2.1.2); or
 - ii) the transport of unpackaged solids, articles (5.3.2.1.4); or
 - iii) “doubling” the orange-coloured plates, if the plates which are fixed on the container, tank container, ... are not visible (5.3.2.1.5); and

- b) The cargo contains
- i) only one dangerous substance (that means only one UN-Number); and
 - ii) no other goods (dangerous and non-dangerous).
7. In these cases one can mark the transport unit with orange-coloured plates (bearing hazard identification number and UN-Number) at the front and the rear.
8. If we consider situation 2b:
- A tank-vehicle (tank with three compartments, loaded with UN 1203) carries also some plastic boxes with non-dangerous goods. This situation forbids the application of 5.3.2.1.6.
- The idea of 2b is, that one must not mix the loading of the tank compartments e.g.: dangerous good – non-dangerous good – dangerous good ... then the compartments have to be marked accurately. The simplified marking with orange-coloured plates bearing numbers at the front and the rear is not allowed.
9. If we consider situation 2a:
- A tank-vehicle (tank with one compartment, loaded with UN 1202) carries also some boxes or jerry cans with dangerous goods (e.g. additives) in line with 3.4 ADR.
- This cargo has no influence on the orange-coloured plates, but prohibits the application of 5.3.2.1.6.

Proposal

Sub-chapter 5.3.2.1.4

10. Replace the term “transport-units” by the term “vehicles”:
- When a hazard identification number is indicated in Column (20) of Table A of Chapter 3.2, ~~transport units~~ **vehicles** and containers carrying

Sub-chapter 5.3.2.1.6:

11. A precise description of “dangerous substances” and the prohibition of the transport of non-dangerous goods only tanks or carriage in bulk:

Amend 5.3.2.1.6 to read:

“For transport units carrying:

- only one dangerous substance, **which requires the marking with orange-coloured plates**, and
- no non-dangerous substance **in fixed tanks, portable tanks, demountable tanks, tank-containers, MEGCs or carried in bulk**,

the orange coloured-plates described in 5.3.2.1.2, ...”.

Justification

Safety The proposals do not change the safety standard of the sub-chapter 5.3.2.1.4, resp. 5.3.2.1.6.

Feasibility	The proposals clarify the content of sub-chapter 5.3.2.1.4, resp. 5.3.2.1.6 and do not change the content of this two sub-chapters.
Enforceability	The proposals are helpful to elucidate the goal of these two sub-chapters (especially for the user).
