Extending the scope of application of the provisions of Chapter 5.2 regarding weather-resistance to placards, orange-coloured plates and marks

Transmitted by the International Union of Railways (UIC)* **

Introduction

1. In combined transport, adverse weather conditions or other factors such as cold, moisture, headwinds and in some instances long distances covered (e.g. in the case of maritime transport) frequently cause placards, orange-coloured plates or marks affixed by loaders, fillers or other participants in the form of self-adhesive sheets at the starting point of the transport chain to become completely or partially detached from their surface in the course of the journey; transport units affected most frequently include large containers, MEGCs, tank-containers, portable tanks, swap bodies and road vehicles.

2. This may cause difficulties in hazard control and delays in transport due to the need to renew the marking and should therefore be avoided to the extent possible.

3. Chapter 5.2 currently contains provisions on weather-resistance for marks and danger labels (see sub-sections 5.2.1.2 and 5.2.2.1.7).

* In accordance with the programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/2016/28/Add.1 (9.2)).

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4. Furthermore, sub-section 5.3.2.2 contains provisions on weather-resistance and durable marking for orange-coloured plates.

5. UIC would therefore like to suggest that the current gap with regard to placards and marks be closed by extending the scope of application of the provisions on weather-resistance and durable marking, which currently refer specifically to orange-coloured plates, to cover placards and marks as well. Furthermore, additional provisions on suitable marking methods should be included in line with section 5.3.1.1.2 of the IMDG Code.

**Proposal 1**

6. Add the following to 5.3.1.1.1:

"The placards shall be weather-resistant and shall ensure durable marking. Suitable marking methods shall be used to ensure that placards remain readily visible throughout the entire journey. When considering suitable marking methods, the ease of marking of the respective surfaces of the cargo transport units shall be taken into account."

**Proposal 2**

7. Add the following to 5.3.2.2.1:

"Suitable marking methods shall be used to ensure that orange-coloured plates remain readily visible throughout the entire journey. When considering suitable marking methods, the ease of marking of the respective surfaces of the cargo transport units shall be taken into account."

**Proposal 3, alternative 1**

8. Add the following to 5.3.3:

"The mark shall be weather-resistant and shall ensure durable marking. Suitable marking methods shall be used to ensure that the mark remains readily visible throughout the entire journey. When considering suitable marking methods, the ease of marking of the respective surfaces of the cargo transport units shall be taken into account."

**Proposal 3, alternative 2**

9. Add the following to 5.3.3:

"The other provisions of 5.3.1 concerning placards shall apply mutatis mutandis to the mark."

*(It is not necessary to amend the provisions for the marking of environmentally hazardous substances, because for these marks, the other provisions of 5.3.1 for placards apply accordingly (cf. last sentence of 5.3.6.3.)).*

**Feasibility**

10. UIC is of the opinion that the proposed measures will enhance safety and that they can be implemented at next to no additional cost. Awareness of the need to use greater care during marking will be increased among loaders, fillers etc. responsible for affixing
placards and marks. Weather-resistant and durable marking will not only prevent irregularities in hazard control, but will also contribute to avoiding delays during transport.