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Inland Transport Committee

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**
Bern, 10–11 September 2020, and Geneva, 14–18 September 2020
Item 5 (b) of the provisional agenda
Proposals for amendments to RID/ADR/ADN:
New proposals

Orange-coloured plate marking of wagons and vehicles carrying tanks or small bulk containers

Transmitted by the Government of Switzerland* **

Summary

Executive summary: The exemption provided for in the note in RID/ADR/ADN 5.3.2.1.5 is applicable only to wagons and covered or sheeted vehicles. This results in an inconsistency between the marking of covered or sheeted wagons and vehicles and that of open wagons and vehicles.

Moreover, as 5.3.2.1.5 applies not only to tanks but also to bulk containers, the exemption provided for in the note in RID/ADR/ADN 5.3.2.1.5 should be extended to wagons and vehicles carrying small bulk containers.

Action to be taken: Amend the note in 5.3.2.1.5.

Related document: ECE/TRANS/WP.15/AC.1/2007/47

Introduction

1. The note in RID/ADR/ADN 5.3.2.1.5 allows tanks with a maximum capacity of 3,000 litres to be carried in covered or sheeted wagons/vehicles without the need to affix

* Subprogramme 2 of the programme budget for 2020 (A/74/6 (Sect. 20) and supplementary information).

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orange-coloured plates on both sides of the carrying wagon/vehicle. Thus, only the marking of the wagon/vehicle with placards is prescribed and the transport is comparable to the transport of dangerous goods in large packagings (intermediate bulk containers (IBCs) or large packagings).

2. For open wagons/vehicles carrying tanks with a maximum capacity of 3,000 litres, 5.3.2.1.5 remains applicable. These wagons/vehicles must bear an orange-coloured marking when the orange-coloured plates affixed to the tank are not clearly visible from outside the wagon/vehicle.

3. This results in a difference in treatment between the marking of covered or sheeted wagons/vehicles and that of open wagons/vehicles, which we believe is unjustified in terms of safety. On the other hand, 5.3.2.1.5 applies not only to the carriage of tanks but also to the carriage of bulk containers (introduced in the 2019 edition). The note should therefore be modified so that the exemption from marking is applicable to all types of wagons/vehicles carrying tanks or small bulk containers.

Proposal

4. Amend the note in RID/ADR/ADN 5.3.2.1.5 to read as follows (new text in bold, underlined and deleted text in bold, strikethrough):

“**NOTE:** This paragraph need not be applied to the marking with orange coloured plates of ~~closed and sheeted~~ wagons/vehicles carrying tanks **or bulk containers** with a maximum capacity of 3,000 litres.”

Justification

5. As in the case of covered or sheeted wagons/vehicles, the exemption of open wagons/vehicles from the orange-coloured marking does not pose a safety problem. In both cases, the transport is similar to the transport of dangerous goods in packages and the danger can be identified by means of placards. It should also be noted that small tank containers and small bulk containers are more solidly built than IBCs and large packagings.
