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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, 21-25 March 2011

Item 2 of the provisional agenda

Tanks

Terminology in 6.8.2.5.2 (all classes) and 6.8.3.5.6 (Class 2) concerning the marking

Transmitted by the Government of Germany^{1, 2}

Introduction

1. In the texts of 6.8.2.5.2 and 6.8.3.5.6, there are editorial differences in the terminology concerning the marking.
2. During the last session of the RID Committee of Experts (Luxembourg, 2–4 November 2010), document OTIF/RID/CE/2010/15 by Germany had pointed out several differences in the marking of tank-wagons in RID (see left-hand column of RID 6.8.2.5.2: "... **on both sides of the tank-wagon itself or on a plate ...**" / left-hand column of RID 6.8.3.5.6: "... **on both sides of the tank-wagon or on plates ...**").
3. For tank-wagons for gases of Class 2 in Germany, these differences had in various cases led to the marking being randomly positioned on the tank-wagon (on the outside of the tank).
4. The proposal by Germany to adapt the wording of 6.8.3.5.6 to the wording of 6.8.2.5.2 has been adopted with minor amendments by the RID Committee of Experts.

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)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2011/20.

5. As one plate may not provide enough space to include all the information prescribed, it was pointed out that several plates should be allowed, as in the existing text of 6.8.3.5.6. Furthermore, the wording of the proposed transitional provision has been adapted to existing transitional provisions (see paragraph 14 and Annex I (adopted texts) of the draft report on the forty-ninth session of the RID Committee of Experts).

6. The representative of Germany agreed that he would also check whether these amendments in the marking of tank-wagons would also have an effect on the marking of tank-vehicles and tank-containers, and would submit a proposal to the Joint Meeting if necessary (see paragraph 15 of the draft report on the forty-ninth session of the RID Committee of Experts).

7. The provisional examination has proven the existence of editorial differences in ADR as well (the problem, however, being contrary to the RID problem):

- Left-hand column of ADR 6.8.2.5.2: "... **on the tank-vehicle itself or on a plate** ...";
- Left-hand column of ADR 6.8.3.5.6: "... **on the tank itself or on a plate** ...".

8. The provisions of ADR 6.8.2.5.2 might be seen as ambiguous as well, the particulars concern the whole tank-vehicle and therefore can be positioned at any place of the tank-vehicle (including outside the tank).

9. Yet, further examinations, especially of the wording of the special provisions TM 1, TM 2 and TM 3 of Section 6.8.4, have shown that any additional particulars, other than the marking according to 6.8.2.5.2, have to be inscribed on the tank itself. Consequently, the first sentence of ADR 6.8.2.5.2 should be amended to read as follows:

"The following particulars shall be inscribed **on the tank itself** or ...:"

10. It should also be checked for ADR whether one plate might, in some cases, be insufficient for the information prescribed, and whether the use of more than one plate should, though, be authorized. The according amendment ("... **or on plates**") would necessarily have an impact on the wording of ADR 6.8.3.5.6 as well as on the respective provisions concerning tank-containers in RID/ADR, which would have to be changed accordingly.

11. In this context, the representative of OTIF has raised the question whether there was need for additional requirements concerning the visibility of the marking according to 6.8.2.5.2. Whereas according to 6.8.2.5.1 the plate is to be positioned at a readily accessible place, there is no such provision in 6.8.2.5.2. But as this cannot be seen as a merely editorial amendment, the decision lies with the Joint Meeting.

Proposal

12. Germany suggests that the Joint Meeting examine these questions as well as the present discussion results. If necessary, Germany will submit a proposal in the form of an informal document.

Justification

13. Elimination of editorial differences and clarification of intentions.
