



# Economic and Social Council

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## Economic Commission for Europe

### Inland Transport Committee

### Working Party on the Transport of Dangerous Goods

#### Ninety-third session

Geneva, 5–9 November 2012

Item 6 (b) of the provisional agenda

#### Proposals for amendments to Annexes A and B of ADR:

#### Miscellaneous proposals

### Dimensions of orange-coloured plates in 5.3.2.2.1

#### Transmitted by the Government of Switzerland<sup>1</sup>

#### *Summary*

**Executive summary:** Amend the proposal contained in informal document INF.16 from the WP.15 meeting held in May

**Reference documents:** Informal document INF.16 from the WP.15 session held in May

### Introduction

1. During the May 2012 session, the Working Party dealt with informal document INF.16. There is an issue concerning the size of orange-coloured plates which has become quite important in recent years because, despite their large size and theoretically available surface area, even large vehicles do not have sufficient surface area to affix plates of normal size. We believe that the matter should be better addressed in ADR.

2. According to the second paragraph of 5.3.2.2.1, the condition for using smaller orange-coloured plates is if the available surface area is insufficient. However, there are

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<sup>1</sup> The present document is submitted in accordance with paragraph 1 (c) of the terms of reference of the Working Party, as contained in document ECE/TRANS/WP.15/190/Add.1, which provides a mandate to “Develop and update the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)”.

large vehicles whose available surface area should allow for standard orange-coloured plates to be fitted, but whose construction and technical characteristics are such that it is not possible to affix plates of normal size. For example, certain parts of the front of the vehicle are made of materials that do not allow for a plate to be fitted and it is not possible to fit a standard orange-coloured plate elsewhere. The term “available surface area” covers all surface areas irrespective of whether they are suitable for orange-coloured plates to be fitted on them. It seems to us that the term “available surface area” does not reflect clearly enough the idea of the surface area on which it is still possible to affix a plate and that such an “available surface area” does not encompass all surface areas on the vehicle on which a plate cannot be affixed.

3. The term “construction” could be interpreted as meaning technical characteristics and form. Thus, for example, if there is a part in plastic, it could be a reason justifying the fitting of a small plate on a more suitable surface. However, the fact that the term “construction” is next to the words “size” and “available surface area” could be interpreted as referring to a construction whose size and surface area are not sufficient to affix a plate but not construction in the sense of the material, form or technical characteristics of the engine. The text should take better account of technical characteristics and allow for smaller plates to be fitted.

4. We propose adding the qualifier “suitable” to the term “available surface area” in order to include the concept of the suitability of the surface on which the plate is affixed.

## Proposal

Amend the second paragraph of 5.3.2.2.1 as follows (new text underlined):

“If the size and construction of the vehicle are such that the suitable available surface area to affix these orange-coloured plates is insufficient ~~to affix these orange-coloured plates~~, their dimensions may be reduced ...”.

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