

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

102nd session

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Item 5 (b) of the provisional agenda

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

10 May 2017

Amendment of 1.1.4.2.2 concerning the requirements for marking with orange-coloured plates

Transmitted by the governments of Switzerland and Norway

Related document

ECE/TRANS/WP.15/2017/2

Introduction

On the first day of the 102nd session of WP.15 Switzerland presented document 2 concerning the requirement in ADR 1.1.4.2.2 for marking of transport units that are marked according to the IMDG code, with orange-coloured plates. In this document Switzerland expresses concerns that the current wording referring to 5.3.2 might lead to the interpretation that such transport units shall be marked with orange-coloured plates in all cases, even when they otherwise, according to ADR, would have been exempted from such requirement, for example when carrying a load subject to 1.1.3.6. Switzerland proposed to add the words "when applicable" to the end of the paragraph to solve this.

Not all delegations agreed that this was a problem. However, some delegations agreed that there could be a problem with the interpretation, but were in favour of other solutions to the problem.

Considering the discussion, we think that the risk of misinterpretation can be reduced by simply deleting the reference to 5.3.2. By referring to ADR as a whole, instead of 5.3.2, the exemptions of 1.1.3.6, 3.4, 3.5 and of different special provisions of chapter 3.3, will be taken into account.

Proposal

(text to be deleted stricken out)

- 1.1.4.2.2 Transport units composed of a vehicle or vehicles other than those carrying containers, portable tanks, tank-containers or MEGCs as provided for in 1.1.4.2.1 (c), which are not placarded in accordance with the provisions of 5.3.1 of ADR but which are marked and placarded in accordance with Chapter 5.3 of the IMDG Code, shall be accepted for carriage in a transport chain including maritime transport provided that the orange-coloured plate marking provisions ~~of 5.3.2~~ of ADR are complied with.

Justification

This small amendment will reduce the possibility of misinterpretation of the above paragraph.
