

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Section 5.3.2.1.5: orange coloured plate marking of vehicles

Transmitted by the European Chemical Industry Council (CEFIC)

Background



Reusable pressure tanks approved as tank containers or UN portable tanks with a filling capacity in the range of normally 500 to 5000 litres are increasingly being used in the industry, particularly for critical and high-value products. These containers may well be considered as one of the safest types of containment for the transport of dangerous goods.



Especially the smaller types (filling volume up to 1000 ltrs), which look very similar to metal IBC's, are very popular and are regularly transported on road vehicles together with groupage freight.

The adoption of proposal TRANS/WP.15/AC.1/2005/31 of Belgium by the Joint Meeting in September 2005, resulted in the new placarding provision 5.3.2.1.5: "If the orange-coloured plates, described in 5.3.2.1.2 and 5.3.2.1.4 affixed to the containers, tank-containers, MEGCs or portable tanks are not clearly visible from outside the carrying vehicle, the same plates shall also be affixed to both sides of the vehicle".

Discussion

Whereas the introduction of this new marking provision makes perfectly sense for transport by rail, where construction elements of the rail wagon may indeed obstruct the view of the marking on large containers (see illustrative picture in TRANS/WP.15/AC.1/2005/31), this new requirement leads to a number of practical problems in the transport by road.

Nowadays the transport of packaged goods makes frequent use of so-called "curtain trailers", i.e. trailers without side boards but with canopies stretching down to the loading floor (see photo right).

There is actually no or a very limited possibility to affix orange coloured plates in the form of a self-adhesive sheet. Sticking them onto the curtain canopy is not advisable, since



this will damage or at least heavily soil the tarpaulin.

This would even be worse, if several self-adhesive sheets for different substances would need to be affixed, representing a source for confusion to intervention services.

It is worthwhile noting that a trailer carrying the same array of products but contained in IBCs, merely requires labelling with a single neutral orange plate at the front and rear.

Although (according to 5.3.2.1.6) orange plates, placed at the front and rear of a vehicle, may be sufficient in case identical substances are being carried, there are still serious practical problems:

- Standard vehicles for packaged goods are not regularly equipped with orange plates meeting the fire-resistance criteria according to Section 5.3.2.2.2;
- It could well be imagined that self-adhesive sheets, displaying the hazard- and substance identification number, would be affixed in a non-professional way onto the standard neutral orange panels, mounted on the vehicle carrying these reusable pressure tanks!



While this problem is particularly acute for curtain trailers, it also applies to other, less frequently employed vehicle types, such as standard canopy/sideboard and box trailers (see photo left) because also these do not possess specifically suitable surfaces to affix self-adhesive sheets.

Additionally, according to the Note in 5.3.1.3, vehicles carrying swap bodies (other than tank swap-bodies or than swap-bodies carried in combined road/rail transport) of which the placards are not visible from outside, do not require to be placarded but must now be marked with orange plates.

This will probably lead to considerable confusion amongst the persons involved in the logistics chain, and with enforcement bodies.

More seriously even emergency services could be misled by the hazard- and identification number displayed on the orange plate: the emergency action taken on the basis of this information may conflict with the emergency actions required for other substances on board, packed in drums or IBCs, which do not require this marking of the vehicle.

Proposal

CEFIC therefore proposes to add a NOTE to 5.3.2.1.5:

NOTE This subsection does not apply to the marking with orange coloured plates of closed and sheeted vehicles.

If this proposal would be adopted, it is recommended to issue a multilateral ADR-agreement, allowing a derogation from the provision of 5.3.2.1.5 till 30 June 2009, when this amendment would enter into force.

Justification

The current new provision in 5.3.2.1.5 will hardly result in any gain in safety for the transport by road but will indeed lead, as illustrated above, into a number of unnecessary technical obstacles, confusion and even safety risks.

Such marking is not required for vehicles carrying IBCs, which in comparison to tank-containers are considerably more simple types of containment.

The marking practice in the scope of the ADR valid before 1 January 2007 has not led to any incidents or difficulties in the transport by road.

Therefore Cefic is of the opinion that this marking provision should be limited to the transport by rail (RID) and should be removed from ADR at least for closed and sheeted vehicles.
