

**Working Party on the Transport  
Of Dangerous Goods**

(Seventy-second session,  
Geneva, 13-17 May 2002)

Chapter 5.3

Amendment of 5.3.2.2: Specification of orange plates.

Comments on the proposal from Germany and Spain in TRANS/WP.15/2002/14

Submitted by International Road Transport Union (IRU)

**SUMMARY**

**Executive summary:** Even if the safety issue regarding the visibility of the orange plates, the UN numbers and Hazard Identification numbers should in no way be played down, the ADR (and RID?) should not regulate the material and its characteristic more detailed than today. Outstanding problems are more related to non-respect of existing regulations and should be tackled at the yearly inspection.

Reference to national standards, like DIN, in UN conventions should be avoided. Remarks in the proposal regarding feasibility are incorrect.

**Action to be taken:** The proposal should be rejected.

**Related documents:** TRANS/WP.15/2002/14.

**Introduction**

The irregularities quoted in the introduction to the proposal should be stopped by inspection of vehicles and transport units combined with a better understanding by involved parties of the importance of safety regulations. In the opinion of IRU it does not help to make a complex legislation even more complex by introduction of material specifications and references, which only a few people (and certainly neither transport operators nor their drivers) understand.

Reference to material standards in one or a few of the contracting parties, not known or easily obtained by other countries, will not improve the understanding, but create discrimination among suppliers of safety equipment.

**Proposal**

Like the UN recommendations and partly like the existing text, the Convention should mainly stipulate the objectives of the marking, i.e. the visibility also in case of incidents like fire (e.g. 5.3.2.1.8 and 5.3.2.2.2). It should be left to the highly competitive market of suppliers of safety equipment to produce plates, which meet the requirements. The proposal should be rejected.

## **Justification and safety implications**

It should not be played down that irregularities regarding the serviceability of orange plates may have safety implications for the fire brigade and other rescue services, but the problem is not solved by detailed and very complex prescriptions for production of plates.

## **Feasibility**

In the proposal it is mentioned that the plates have to be inspected by a competent authority in the contracting parties. To add new institutions to the long list already existing involved in controlling different parts of ADR does not necessarily improve the situation.

The reference: “additional costs are mostly caught up by a longer lifetime of the plates and the fastenings” is not correct. To exchange several hundred thousands of orange plates in the 38 countries being contracting parties involve quite a few million of Euros, and the consequences on the highly competitive market for safety equipment i.a. discrimination of some existing suppliers are difficult to evaluate.