

Amendments to the requirements for orange-coloured plates

Comments on document TRANS/WP.15/2002/14

Transmitted by the Government of Denmark

Denmark acknowledges the need for some improvements of the text in the present sub-section 5.3.2.2, but is not entirely convinced of the need for all the proposed amendments. First of all, the fire test in 5.3.2.2.2 (c) seems very stringent and Denmark believes that the duration of the fire test should be restricted to 15 minutes as in the present text.

Secondly, the requirement in 5.3.2.2.2 (e) serves very little purpose, since it is virtually impossible to provide the evidence for resistance against any chemical or mechanical effect that might occur. The fact that the plate is made of steel (5.3.2.2.2 (d)) and that the numbers should always be legible (5.3.2.2.2 (a)) should suffice.

Furthermore, Denmark is not in favour of the introduction of a type approval procedure. The competent authority can always make the request to see the documentation proving the properties of the orange-coloured plate in question. A type approval procedure can always be introduced later if the WP.15 finds it necessary based on obtained experience.

Finally, the transitional period should be prolonged in order to make it possible for the carriers to spread the related costs over more than just one year.

Proposals:

Amend the proposals in TRANS/WP.15/2002/14 as follows:

- In 5.3.2.2.2 (c) replace "30 minutes" with "15 minutes".
- Delete 5.3.2.2.2 (e) and renumber (f) as (e).
- In 5.3.2.2.2 delete the sentence "For each type of orange-coloured plate..."
- In the new sub-section 1.6.1.5 replace "31 December 2005" with "31 December 2009".