

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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Item 5(a) of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Section 5.3.2: General orange-coloured plate marking provisions

Transmitted by the Government of Sweden

1. Sub-section 5.3.2.1.1 requires that transport units shall display orange-coloured plates at the front and at the rear of the transport unit. In sub-section 5.3.2.1.2, there is an additional provision stating that tank-vehicles, battery vehicles or transport units having one or more tanks, also shall display orange-coloured plates on the sides of each tank, tank compartment or each element of battery vehicles in cases where a hazard identification number is indicated in table A.

2. However, since sub-section 5.3.2.1.1 only applies for transport units, it is not required to display orange-coloured plates at the front and the rear on those vehicles mentioned in sub-section 5.3.2.1.2 when they are not part of a transport unit. This means that when e.g. tank-trailers are parked during the transport chain, these trailers are only required to have plates on their sides. If several vehicles are parked in a row as exemplified in the picture below, it would be very difficult for the emergency responders to note that trailers are marked with plates, since they are hidden behind other vehicles. Furthermore, parked trailers loaded with packagings are not required to have any orange-coloured plates at all.

3. This problem would also arise for piggy back transport if the proposal to the RID-FA meeting in November would be adopted (see OTIF/RID/CE/2009/2 and INF.11).

4. In Sweden, we have solved this problem by a national derogation, stating that all parked trailers or swap-bodies shall display orange-coloured plates at the front and the rear. However, since this is a national provision it only applies to national transports. For safety reasons, we propose to introduce this requirement in ADR and would like to hear the view of the WP.15 meeting on this matter.

**Proposal**

Add a new sub-section 5.3.2.1.9 to read as follows:

“5.3.2.1.x The requirements of 5.3.2.1.1 are also applicable to trailers when not attached to a motor vehicle.”

