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**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Eighty-eighth session**

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Agenda item 6 (a) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR: pending issues****Section 5.3.2: General orange-coloured plate marking provisions****Transmitted by the Government of Sweden\****Summary*

<b>Executive summary:</b>	A trailer shall display orange coloured plates at the front and at the rear when separated from its motor vehicle.
<b>Action to be taken:</b>	Add a second paragraph in sub-section 5.3.2.1.1.
<b>Related documents:</b>	INF. 15 (Sweden) of the eighty-seventh session, INF. 32 (Germany and OTIF) of the eighty-seventh session.

**Background and analysis**

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. According to section 1.2.1, "Transport unit" means a motor vehicle without an attached trailer, or a combination consisting of a motor vehicle and an attached trailer. This means that a trailer without a motor vehicle is not a transport unit.

\* The present document is submitted in accordance with paragraph 1(c) of the terms of reference of the Working Party, as contained in document ECE/TRANS/WP.15/190/Add.1, which provides a mandate to "Develop and update the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)".

2. 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.
3. 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.
4. Furthermore, tank-vehicles or transport units having one or more tanks carrying substances in accordance with sub-section 5.3.2.1.3 only need to bear orange-coloured plates affixed in accordance with 5.3.2.1.1. This means that when these trailers are not attached to a motor vehicle, they are not required to have any orange-coloured plates at all. The same situations apply for parked trailers loaded with packagings.
5. This is a problem especially in harbours and at terminals where trailers often are separated from their motor vehicles but are still under carriage.
6. Sweden and Germany believes that containers, MEGCs, MEMUs, tank-containers, portable tanks as well as vehicles shall be marked or placarded during carriage including stops before, during and after the change of place.

## Considerations

7. Requirements for placarding exist in Chapter 5.3 for containers, MEGCs, MEMUs, tank-containers, portable tanks and vehicles. However, there are no placarding requirements for vehicles carrying packagings, if not containing Classes 1 or 7.
8. Together with the insufficient requirements for orange-coloured plate marking (for vehicles), a non-acceptable situation exists.
9. During the forty-seventh session of the RID Committee of Experts on the Transport of Dangerous Goods, certain amendments to the requirements concerning marking of piggyback transport were adopted. However, if marking requirements for trailers are introduced in ADR, the regulations in RID on piggyback transport could be simplified.
10. The aim of this proposal is not to change any provisions for containers, MEGCs, MEMUs, tank-containers and portable tanks but only the marking requirements for trailers when separated from their motor vehicles.

## Proposal

11. Add a second paragraph in sub-section 5.3.2.1.1 to read as follows:  
“These requirements are also applicable to trailers when not attached to a motor vehicle.”