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

**Joint Meeting of the RID Safety Committee  
and the Working Party on the Transport of  
Dangerous Goods**

(Geneva, 15-25 September 1998)

**ENFORCEMENT OF THE ADR RULES**

**MULTI-MODAL OPERATIONS WITH PACKAGED GOODS VEHICLES**

**MARKING AND PLACARDING OF VEHICLES ACCORDING TO THE IMDG CODE**

**CONTINUATION OF JOURNEYS AFTER MARITIME TRANSPORT**

**Transmitted by the European Portable Tank Association (EPTA) \*/**

The EPTA has been asked by a major multi-national chemical manufacturer to take the opportunity presented by the September 1998 session of the Joint Meeting to draw contracting States attention to the difficulties encountered with multi-modal transport of packaged dangerous goods in road vehicles (transport units) by road, sea and then by road again.

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<sup>\*/</sup> Distributed by the Central Office for International Railway Transport (OCTI) under the symbol OCTI/RID/GT-III/1998/38.

For transport by sea, road vehicles are required to display marks (e.g. the Marine Pollutant Mark) and placards (large diamond labels) on each side and rear. If the vehicle is an articulated vehicle, these requirements are extended to the front of the semi-trailer (see Sub-section 7.3 of the General Introduction to the IMDG Code.). EPTA would ask RID and ADR contracting States to note that there is a three-months-in-the-sea durability requirement for all marks and placards affixed to transport units of all kinds in the IMDG Code (Sub-section 7.3.1.3).

Vehicles of this kind carrying packaged dangerous goods by road internationally in Europe *are not* subject to any similar provisions of the ADR. The ADR requirements at most are for the plain, reflectorised orange plates to be displayed.

Quite recently, enforcement practices have been brought to the attention of the EPTA by the above-mentioned chemical manufacture whereby the enforcer demands that the driver of a vehicle removes all marks and placards before being allowed to continue a journey by road after completion of the journey by sea.

EPTA believes that the enforcer is, strictly speaking, correct in making such a demand on drivers as marginal 3901 (3) only allows the display of marks and placards of other modal requirements during transport by road on packages, containers and tank containers. It does not extend this concession to road vehicles and other transport units. EPTA believes that this concession should be extended. Also, to avoid any ambiguity of interpretation, IBCs should also be mentioned.

EPTA takes note of the provisions of marginal 14 of RID and marginal 2007 of ADR but would point out that this marginal is not relevant to this matter.

EPTA considers the matter of marking and labelling of vehicles to be of concern to the ADR agreement only, but for the sake of good order, proposes some consequential amendments to RID:

### **ADR proposal**

Amend marginal 3901 (3) to read:

“In addition to the danger labels prescribed under ADR, *marks* and danger labels (*placards*) conforming to the requirements of other modes of transport may be affixed to packages, *intermediate bulk containers, transport units, closed vehicles, open vehicles, sheeted vehicles, tank vehicles*, battery-vehicles, *fixed tanks, demountable tanks, large and small containers*, tank-containers containing dangerous goods which are transported for a part of a journey by road and which must be *marked and labelled* (placarded) with the provisions of those requirements.”

## **RID Proposal**

Amend marginal 1901 (3) to read:

”In addition to the danger labels prescribed in RID, *marks* and danger labels (*placards*) conforming to the requirements of other modes of transport may be affixed on packages, *intermediate bulk containers*, small containers, large containers and tank-containers containing dangerous goods which are carried at the beginning *and / or* end of the journey by rail for a part of a journey by road and whose *marking and* labelling shall comply with the provisions of the said requirements.”

New text is written in *italics*.

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