

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Interpretation of ADR

Interpretation of 9.2.4.4 concerning EX/II and EX/III vehicles

Transmitted by the Government of Sweden

Sub-section 9.2.4.4 in ADR states that the engine propelling the vehicle shall be so equipped and situated to avoid any danger to the load through heating or ignition. In the case of EX/II and EX/III vehicles the engine shall be of compression-ignition construction.

Before 1990, in marginal 11205 in ADR, the text was dividing EX-transport units into category A, B.I or B.II depending if the engine used a liquid fuel with a flash-point below or above 55 °C. Later these transport units were divided into Type I, II or III depending on the flash-point of the fuel.

In ADR 1999, marginal 11204, specific requirements concerning the engine type appears similar to those stated in sub-section 9.2.4.4 in ADR today.

It seems that before 1999, the fuel characteristics and not the engine type used played an important part in determining the type of transport unit used in the transport of explosives.

Today we have a constant development of engines and fuel, e.g. to produce environmental friendly products etc, that gives us a wide range of fuels. A compression-ignition engine can now use a fuel such as a diesel-ethanol mixture. E.g. Scania builds modified, heavy-duty diesel engines designed to run on almost pure (95%) ethanol.

Even if the manufacturers often only set EX/II- and EX/III-vehicles which have ordinary diesel engines on the market, it may happen that other vehicles will be approved with other types of engines.

Therefore, Sweden would like to know the opinion of the Working Party whether, in sub-section 9.2.4.4, it is the flash point of the fuel or the engine construction that matters in the approval process of EX/II and EX/III vehicles.

If it is the flash-point, we believe sub-section 9.2.4.4 in ADR should be revised similar to the text stated in ADR before 1999.