

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 4 of the provisional agenda

Interpretation of ADR

Vehicles authorized for the carriage in tanks

Transmitted by the Government of Switzerland¹

Summary

Executive summary: Clarify what vehicles are permitted for the carriage of tanks when the vehicles AT, OX and FL are assigned in column (14) of Table A of Chapter 3.2.

Action to be taken: -

Introduction

1. Since the discussions in 2002 about the authorized vehicles for the carriage of dangerous goods the paragraph 43. of the report from Mai 2002 of the WP.15 in document TRANS/WP.15/172 has always been subject to different interpretations:

"42. The discussions showed that, despite paragraph 7.1.2, it was understood that all vehicles corresponding to the definition of article 1 (a) of ADR could be used to carry dangerous goods. However, if an EX/II, EX/III, FL, OX or AT vehicle was prescribed, it must be a vehicle of category N or O. If a vehicle of category N or O other than an EX/II, EX/III, FL, OX or AT vehicle were used, paragraph 9.2.1 specified clearly the conditions applicable. If a vehicle other than an N or O vehicle were used, for example, an M (four-wheeled vehicles for passengers) or a T vehicle (agricultural or forestry tractors), Part 9 was not applicable, but it should be borne in mind that these vehicles were subject in their countries of origin to the general safety conditions of the regulations of the 1958 Agreement applicable to them."

¹ 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. Some interpret this text as allowing the use of drawing vehicles of trailers belonging to category M or T even if the amount carried exceeds the quantities laid down in 9.1.1.2 for the use of vehicles FL, OX and AT.
3. This seems however to be in contradiction with the explanation of column (14) in 3.2.1 where it is clearly stated that:

" Column (14) "Vehicle for tank carriage" Contains a code designating the vehicle **(including the drawing vehicle of trailers or semi-trailers)** (see 9.1.1) to be used for the carriage of the substance in tank in accordance with 7.4.2...."

From the text in 3.2.1 it seems clear that even the drawing vehicle of trailers and semitrailers has to conform with Part 9. Hence no vehicles M or T are allowed when the tank contains more than the quantities laid down in 9.1.1.2.
4. In that case the report from May 2002 should be completed by saying that in the cases where vehicles FL, OX and AT are prescribed, that is over the quantities laid down for tanks in 9.1.2, only drawing vehicles of trailers or semi-trailers of category N or O conforming to the pertinent provisions of Part 9 and Chapter 9.7 are allowed.
5. We want to know if this interpretation is shared by the WP.15.
