

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Ninety-fourth session

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Item 4 of the provisional agenda

Interpretation of ADR

24 April 2013

Type of vehicles allowed

Transmitted by the government of Switzerland

Summary

- Executive summary:** The legibility and the interpretation of the texts concerning the type of vehicle authorized according to the dangerous goods should be improved.
- Action to be taken:** Add a Note in 9.1.2
- Related documents:**

Introduction

1. It is sometimes difficult to interpret the applicable provisions for the vehicle. Thus on the one hand the carrying vehicle (vehicle to be used according to the terminology in 3.2.1) shall be for each entry in conformity with the type indicated in the column (14) of Table A of Chapter 3.2. But it is less obvious to decide which prescriptions apply to the other vehicles which are not the vehicles carrying the load in the case for example a combination made up of a drawing vehicle and a trailer or a semitrailer.
2. The answer is not where it would be awaited, that is in Part 9. It has to be looked for in 3.2.1 and 7.4.2. Moreover it does not arise directly from the texts but it must be deduced from those, fact that does not facilitate the interpretation.
3. In 3.2.1 the text which indicates the type of drawing vehicle to be used in each case appears between brackets in the description of the column (14) "(including the drawing vehicle of trailers or semi-trailers)". For a transport unit such as that appearing in the Annex, if the dangerous goods are on the trailer, and if this dangerous goods require a vehicle AT, the drawing vehicle and the trailer must be at least both of the same type. Because the hierarchy of the types of authorized vehicles is given to us in 7.4.2. Thus if the product is on the trailer and requires at least a carrying vehicle of type AT, the drawing vehicle must be also at least AT but the last indent of the 7.4.2 indicates that it is also allowed to use a vehicle FL or OX. Thus the drawing vehicle can be AT, FL or OX.
4. If the product is on the drawing vehicle (in the first vehicle of the transport unit), the drawing vehicle must be at least of type AT. On the other hand the trailer which does not contain dangerous goods, does not need be approved AT because the bracket mentioned previously as in point 3. does not say that the hierarchy of the 7.4.2 must apply to the trailer

but only with the vehicle to be used and to the drawing vehicle. If the carrying vehicle is also the drawing vehicle only this last is concerned by 7.4.2.

5. We would like to know if the WP.15 shares this interpretation. If such is the case it seems useful to us to differently specify it in the texts in another way than by a bracket in the explanations of the column (14) to section 3.2.1.

Proposal

7. Add a NOTE in 9.1.2:

“ :

“9.1.2 Note 2: Even if it is not the carrying vehicle of dangerous goods, the drawing vehicle of a transport unit made up of a drawing vehicle and a trailer or a semitrailer shall always have an approval according to this section except if the special provision V2 (2) of the 7.2.4 is applicable and the type of vehicle to be used must follow the rules of the 7.4.2. P. e.g. for dangerous goods requiring a vehicle AT, the carrying vehicle and the drawing vehicle can be of type AT, FL or OX. When the dangerous goods are only loaded on the drawing vehicle , the trailer or semitrailer is not subjected to the provisions of this section.

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Annex

