

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

115th session

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Geneva, 2-5 April 2024

Item 5 (a) of the provisional agenda

Proposals for amendments to annexes A and B of ADR:

Construction and approval of vehicles

Sub-section 9.2.4.4.2 for ADR 2025 as proposed in Annex III of the report of the 114th session

Transmitted by the International Organization of Motor Vehicle Manufacturers (OICA)

I. Introduction

1. The table of paragraph 9.2.4.4.2 “Rechargeable Electrical Energy System” has been updated to be valid as a requirement also for AT vehicles. This was proposed within square brackets in document ECE/TRANS/WP.15/2023/14. The proposal was adopted in the 114th session of WP.15 (November 2023) and remaining was only the square brackets around the application date.
2. ADR 2023 introduced the option for AT vehicles in combination with electric propulsion system. The introduction of this option was preceded by a careful examination of which technical requirements would be applicable for this kind of transport.
3. Next step for the – at the time being - oncoming work of ADR 2025, was to identify which technical requirements would be applicable for FL vehicles considering the nature of the goods they transport. A result of this was the introduction of paragraphs “9.2.4.4.2 Rechargeable Electrical Energy Storage System” and “9.2.4.4.3 Measures against thermal propagation”. In document ECE/TRANS/WP.15/2023/14 of the 114th session it was proposed, within square brackets, to introduce the requirement of paragraph 9.2.4.4.2 also for AT vehicles.

II. Proposal

4. Amend the line in the table of paragraph 9.2.1.1 for the subsection 9.2.4.4.2 for ADR 2025 as proposed in Annex III of the report of the 114th session, to read (proposed changes are indicated in strikethrough characters):

TECHNICAL SPECIFICATIONS	VEHICLES				COMMENTS
	EX/II	EX/III	AT	FL	
...
9.2.4	PREVENTION OF FIRE RISKS				
...
9.2.4.4.2	Rechargeable electrical energy system			X ^k	X ^k Applicable to motor vehicles first registered after [31 March 2026]

III. Justification

5. The IWG-EV discussed the application of the provisions for the various categories and achieved consensus for EX/II, EX/III and FL categories. The subject of the AT category was not debated in depth and no technical justifications were tabled to include that category into the list of categories of vehicles subject to these requirements (danger to the load through heating or ignition).

6. Adding more severe provisions to the AT vehicles is not guaranteed to bring any safety benefits in view of the nature and characteristics of the goods transported by these vehicles.

7. Should the AT category be included into the list of categories of vehicles subject to these requirements on Rechargeable Electrical Energy Storage Systems then the existing approvals would ultimately be affected as well while there is currently no feedback about potential danger for that category. Vehicles currently in production would be subject to additional requirements with no concrete safety benefits in daily use.

8. OICA as a consequence suggests removing the AT category of vehicles from the line for 9.2.4.4.4.2 in the table in 9.2.1.1.
