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Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Interpretation of ADR

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Interpretation on electrical equipment on trailers

Transmitted by the Government of Sweden

Introduction

The provisions on transport security in section 1.10 of ADR have led to the development of specific actions to prevent theft or misuse of dangerous goods. Devices and equipment are being installed on vehicles and in load compartments. However, there are requirements on the construction of vehicles in part 9 of ADR that still must be applied.

Example 1

A 24 V battery is installed on an EX/III trailer to serve protective devices (GPS, anti-theft devices etc.) with additional power in case the trailer is separated from the motor vehicle e.g. during an intermodal transport. This battery is charged when the trailer is connected to the towing vehicle.

In 9.3.7.3 the requirements for the electrical installation is specified. Sub-section 9.2.2.3 only seems to deal with batteries mounted on the motor vehicle. However, in this case the battery is mounted on a trailer which is only connected to the motor vehicle during the movement. Therefore, 9.2.2.3.2 is not possible to fulfil but perhaps not “relevant” according to 9.3.7.3.

- Sweden is interested to know if such devices can be installed on an EX/III-trailer if the conditions in 9.3.7.1 and 9.3.7.3 are fulfilled. (See also statement below from the report of the WP.15, TRANS/WP.15/210, para. 20)

Example 2

The same condition as in example 1 but now the trailer is an FL-vehicle. In 9.7.8.1 the word “relevant” is not included in the text. This means that all provisions in 9.2.2.2, 9.2.2.3, 9.2.2.4, 9.2.2.5.1 and 9.2.2.6 have to be fulfilled, also 9.2.2.3.2.

In the report of the WP.15, TRANS/WP.15/210, para. 20, the following is stated: *“The Working Party confirmed that devices in vehicle cabs containing batteries permitting data or parameter storage when not permanently energized (radios, personal navigation assistants, etc.) did not need to meet the general requirements of standard IEC 60079, parts 0 and 14, or the additional requirements applicable under standard IEC 60079, parts 1, 2, 5, 6, 7, 11, 15 or 18.”*

- Sweden is interested to know if the same interpretation can be applied for apparatus such as GPS, burglar alarms with internal batteries etc. installed outside the drivers cab on e.g. an FL-trailer.
- Sweden would also like to hear the views on the need to fulfil 9.2.2.3.2 for the battery master switch on devices mounted on the trailer.