

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 6(b) of the provisional agenda

**Proposals for amendments to Annexes A and B of ADR:
miscellaneous proposals**

Exemption for the liquids used to reduce exhaust gases dangerous for the environment

Transmitted by the Government of Switzerland

Summary

Executive summary: To envisage an exemption for products used in the engines in order to reduce the gas emissions dangerous for the environment

1. Recently we have been confronted with the question of the application of ADR rules for liquids used in the car industry to reduce the gas exhausts dangerous for the environment. Switzerland would like to know if the Contracting Parties to ADR are also confronted with questions coming from industry tending to authorize or exempt products used in the engines of the vehicles intended to reduce the gas emissions dangerous for the environment.
2. The requirements of environmental protection and the standards of emission of air pollutants lead industry to seek solutions with an aim of reducing to the maximum the particle and gas emission which causes the greenhouse effect or which are dangerous for the ozone layer. Various solutions appear and will appear these next years which will be used to take account of these requirements increasingly more strict for the combustion engines.
3. In certain cases these products are dangerous and fall under the rules of ADR. Taking into account the products considered can belong to various classes, it is not possible to find solutions in the ADR for each of them on a case-by-case basis. That would be likely to multiply the texts ADR in a useless way.
4. A more pragmatic approach would be to admit that the equipment used for the approved vehicles and their equipment corresponds to safety requirements tested by the authorities responsible for the safety of these vehicles and that, consequently, these devices do not present particular dangers which justify to apply to them in addition the rules of the ADR. It is with this approach that the exemptions of 1.1.3.2 a), b), d) and e), 1.1.3.3, 1.1.3.7 were introduced. However the products in question which are used to improve the

efficiency of the combustion engines and to reduce impact to the environment are not covered by any of the quoted exemptions.

5. Taking into account they are used for the propulsion of the vehicle or for the operation of one of their equipment we would be interested to know if an exemption going in the direction to treat these products according to their use and to exempt them according to this aspect would not be possible.

6. Considering the very specific type of use it should be possible to exempt them within the framework of the existing exemptions already mentioned. For that it would be enough to extend the scope of the existing exemptions to any product being used for the propulsion or operation of one of the equipment of the vehicle. For the moment the question arose only in the case of the liquid fuels. For this reason we present hereafter a manner of tackling the problem in the case of the liquid fuels.

7. Thus 1.1.3.3 could be modified as follows:

Modify the heading of 1.1.3.3 as follows:

"1.1.3.3 *Exemptions related to the carriage of liquid fuels and liquid products, destined for the propulsion of a vehicle or for the operation of any of its equipment*

Add a paragraph 1.1.3.3 (d) (1.1.3.3 c) is in ADR 2015 dedicated to the fuel for non road mobile machinery)

"1.1.3.3 d) The exemptions 1.1.3.3 a) to c) above are also applicable to the liquids intended to reduce the gas emission of the engines. In case of 1.1.3.3 a) the sum of the quantities per transport unit of these liquids and fuel shall not exceed the quantities allowed in 1.1.3.3 a)."

8. We think that this question arises more for the road vehicles than for the railroads. Nevertheless if such an approach were acceptable for the members of the WP.15, we could present it at the next session of the Joint Meeting and of the WP.15.
