

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

100th session

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Item 6 (b) of the provisional agenda

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

### **Use of Liquefied Natural Gas (LNG), Compressed Natural Gas (CNG) and Liquefied Petroleum Gas (LPG) as fuel for vehicles carrying dangerous goods – upper capacity limits**

#### **Comments on document ECE/TRANS/WP.15/2016/7**

**Transmitted by the Government of Switzerland**

#### *Summary*

**Executive summary:** Introduce the limits of tanks for vehicles containing gases directly in the text of 1.1.3.2 (a)..

#### **Introduction**

1. Document ECE/TRANS/WP.15/2016/7 introduces limits for fixed tanks on vehicles containing fuels of gases LNG, CNG and LPG. We understand the need of a note clarifying the meaning of the text proposed. We believe however that the provisions in 1.1.3.2 (a) should be clearer in order to allow a direct implementation of the limits laid down. We propose the following wording for the new text proposed in 1.1.3.2 (a):

The total capacity of the fixed tanks shall not exceed:

- 1080 kg for LNG and CNG
- 2250 litres for LPG

[NOTE: For the energy content of fuel see European Directive 2009/33/EC, Promotion of Clean & Energy Efficient Road Transport Vehicles, Annex, Table 1.]

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#### **Justification**

2. For the users and the control authorities the only information needed is the one easy to control: If has explained in the note these limits are the ones corresponding to the amount of liquid fuel in 1.1.3.3 a) it is better to introduce this values in the rules directly. Not only through an explanatory note.