

Working Party on the Transport
of Dangerous Goods
(Seventy-fifth session,
Geneva, 19 -23 January 2004)

Part 9 of ADR

Chapter 9.2 Requirements concerning the construction of vehicles
Comments on document 2004/11 from Germany

Transmitted by the Government of Norway

While principally accepting the German argument that the installation of electronically controlled stabilizing systems will increase safety of dangerous goods transport, Norway is of the opinion that to introduce such requirements on EX/II vehicles will be an “overkill”. It is already difficult to obtain such vehicles for the transport of explosives, and introducing this requirement on such vehicles for the purpose of transport of explosives only will only make this situation worse. Also, introducing such requirements on such a short notice without any regard to the increased cost of the vehicles is not appropriate.

Furthermore, Norway has problems with introducing the concept of “off-road vehicles of category N_{3G}” into the proposed new 9.2.7.1.

Norway will use this opportunity to remind WP.15 of the recommendations from the “Tønsberg Working Group” to ask WP.29 to introduce certain new requirements for EX/II and EX/III vehicles (or even better – on all DG-vehicles) to increase the safety of transport of explosives, as presented in paragraph 40 of the report from the WG (TRANS/WP.15/2002/3). These recommendations were:

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- Requests ECE/WP.29 to adopt provisions for battery covers to eliminate the possibility of short-circuiting as a general requirement on all dangerous goods vehicles.
- Requests ECE/WP.29 to develop and implement requirements for surveillance of temperatures on brake-drums/disks to detect binding brakes on EX/II and EX/III vehicles. (all dangerous goods vehicles?)
- Requests ECE/WP.29 to establish a regulation to implement systems for monitoring the tyre pressure on EX/II and EX/III vehicles (all dangerous goods vehicles?).“

Norway will therefore ask the WP.15 to postpone any decision on the German proposal at this meeting, and embark upon a more fundamental discussion on the introduction of new technology on all vehicles covered by Chapter 9 in the next biennium.