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## Economic Commission for Europe

### Inland Transport Committee

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

Ninety-eighth session

Geneva, 4 –7 May 2015

Item 4 of the provisional agenda

**Interpretation of ADR**

29 April 2015

### **Interpretation: “Piggyback traffic” of tank vehicles on road – Applicability of ADR**

#### **Transmitted by the Government of Austria**

The transport of tank vehicles (usually trailers) as freight (e.g. loaded on a low bed trailer or low bed vehicle) is occasionally used after sale or repair. In course of traffic controls tank trailers were found, which contained remainder of dangerous goods (UN 1202, UN 1203 - ADR-situation: “tank, empty uncleaned”).

*In few cases this “transport strategy” was used to bring tank trailers (full with UN 1202) to construction areas - used as reservoir for fuel.*

How to evaluate this transport in the perspective of ADR?

- 1.1.3.1 This situation is not regulated (it is similar, but not identical, with lit f).
- 1.1.3.3 Transport of fuel in vehicles, but necessary for their function.
- 1.1.3.5 It is only applicable for packaging.
- 1.1.3.6 The dangerous good has to be carried in packages.
- SP 363 Regulate the transport of fuel in engines.

Is this a transport of dangerous good, fully regulated by the ADR?

This means: training of the vehicle crew, documentation, instruction in writing, special equipment, placards, ... .

In this case: need the tank trailer and/or the transport vehicle an approval (FL-vehicle, certificate in accordance to 9.1.3.5)?

Or:

Is this a mode of transport (carriage) which is not allowed under the regulations of ADR?

This means: a special approval is necessary.

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