

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

103rd session

Geneva, 6-10 November 2017

Item 5 (a) of the provisional agenda

**Proposals for amendments to Annexes A and B of ADR:
construction and approval of vehicles**

3 November 2017

Comments on 2017/11: Tanks: First inspection waiver for EX/II, EX/III, FL and AT vehicles and MEMUs type-approved in accordance with 9.1.2.2 and for which a declaration of conformity with the requirements of Chapter 9.2 has been issued

Transmitted by the Government of United Kingdom

Summary

Executive summary: At the previous session the United Kingdom suggested, in light of experience, that the Working Party could consider a proposal to extend ADR 9.1.2.1 to allow the competent authority to waive the first inspection of EX, FL and AT vehicles and MEMUs until the first anniversary test. The results of such first anniversary tests in the United Kingdom have to date been positive, and more data will become available to help consider further the proposal. In the meantime, to reflect experience from the implementation and comments from the Working Party, the terms and scope of the waiver are being refined.

Action to be taken: Defer further discussion pending more experience.

Introduction

1. To overcome delays with first inspections of tank vehicles after the introduction of new administrative processes, and given the positive results at those inspections, the United Kingdom issued an authorisation in August 2016 to waive the first inspection of EX, FL and AT vehicles and MEMUs until the first anniversary test. This worked well, and at the previous session the United Kingdom, in ECE/TRANS/WP.15/2017/11, invited the Working Party to begin consideration of a proposal to extend ADR 9.1.2.1 to allow the competent authority to waive such first inspections until the first anniversary test. A number of delegations made comments and it was generally considered that more experience was required before the proposal could be discussed further.

2. Since then the results of such first anniversary tests in the United Kingdom have to date been positive, with only two tank vehicles out of 254 tank vehicles failing the first anniversary test, but on roadworthiness grounds only. However, there are a further 410 tank

vehicles yet to have their first anniversary tests, so more data will become available to help the Working Party to consider further the proposal.

3. In addition, to reflect experience from the implementation and comments received at the previous session, new terms have been added to the waiver to include requirements for the type approval and initial inspection certificates to accompany the declaration, and for competent authority acceptance of the declaration to be carried on the tank vehicle or MEMU. Also, work is underway to restrict the scope of the waiver to types of EX, FL and AT tank vehicles and MEMUs, in respect of both the tank type approval and the ADR vehicle type approval in combination, where these have previously undergone ADR Part 9 inspection and certification.

4. At the next session the United Kingdom will share an example of the revised declaration and provide an update on our experience with a view to a further discussion of the proposal.
