

**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

Working Party on the Transport  
of Dangerous Goods

(Sixty-seventh session,  
(Geneva, 8 -12 November 1999)

Annex B of ADR

Marginal 10 222(1)

Transmitted by the Government of Norway

**SUMMARY**

Executive Summary: The new marginal 10 222 regarding combustion heaters that was introduced in the 1999 version of the ADR has a reference in marginal 10 222(1) to "Combustion heaters in the driver's cabin and for the engine of the vehicle...". This text has led to an interpretation that is detrimental to the safety of FL vehicles.

Action: WP.15 is asked to give an official interpretation of the text as a first step, and have to make sure that the corresponding text of the restructured ADR is unambiguous on this point.

Related documents: ECE/TRANS/130 Vol. II)

Introduction

The new marginal 10 222 regarding combustion heaters that was introduced in the 1999 version of the ADR has a reference in marginal 10 222(1) to "Combustion heaters *in the driver's cabin and for the engine* of the vehicle...". This text has led to an interpretation that the referenced provisions of marginal 220 536 is then only valid for combustion heaters on Type FL vehicles installed solely for this purpose. If combustion heaters are used on a Type FL vehicle for other purposes, such as heating of the compartment for pumping equipment or for heating of the tank itself or equipment mounted on the tank, the provisions of marginal 220 536 is not relevant.

The Expert from Norway is of the opinion that when this text was formulated, it was the intention to make sure that all combustion heaters on the type of vehicles listed in the table of marginal 220 500, for whatever use, had a sufficient safety level. The reason for using the term "in the driver's cabin and for the engine" was to make sure that "all" possibilities was covered and to differentiate from the provisions for combustion heaters installed for heating of loading compartments in 10 222(2). No one at that point in time had foreseen the use of combustion heaters for other purposes on this type of vehicle.

#### Proposals

1. The WP.15 makes it clear that the present text of marginal 10 222 (1) was written with the intention to make sure that any combustion heater situated on a type of vehicle listed in the table of marginal 220 500 had to comply with the relevant provisions of marginal 220 536.

2. The corresponding text of the restructured ADR is changed to read:  
"Combustion heaters installed on vehicles of the types indicated in the table of 9.2.1 shall conform to 9.2.4.7."

#### Justification

Safety: To make sure that any combustion heater installed on vehicles of a type listed in the table of 9.2.1 has the same level of safety.

Feasibility: The proposed change will only assure that the interpretation of 9.2.1 is unambiguous.

Enforceability: The proposed change will assure an uniform interpretation of the present text.

----- o o o -----