SUMMARY

Executive summary: The question was raised whether it is acceptable to draw a trailer which needs according to its load, to comply with the requirements for an FL vehicle with a drawing vehicle which complies with the requirements for an AT vehicle and vice versa. The current provisions seem to be unclear on this subject.

Action to be taken: It is proposed to introduce additional provisions covering the operation of vehicles of all types.

Related documents: No related document.
Introduction

1. In Germany the question was raised whether it is acceptable to draw a trailer which needs according to its load, to comply with the requirements for an FL vehicle with a drawing vehicle which complies with the requirements for an AT vehicle and vice-versa.

2. In the case of a combination of vehicles composed of a FL trailer and an AT drawing vehicle, it is not possible to cut-off the electrical equipment of the trailer by using the battery master switch. Therefore an AT drawing vehicle is not deemed adequate to draw a FL trailer.

3. On the other hand, no problems are envisaged if a FL drawing vehicle draws an AT trailer.

4. For OX trailers, there are no requirements exceeding those for FL trailers. Only the requirement for the driver cabin of OX motor vehicles are more stringent than those for FL vehicles. If OX substances (which are UN 2014, hydrogen peroxide, aqueous solution and UN 2015, hydrogen peroxide, aqueous solution, stabilized only) are loaded on a trailer, an igniting impact to the drawing vehicle is not expected. Therefore, drawing trailers loaded with OX substances by FL vehicles would not cause concerns.

5. Sub-section 9.1.2.3 of ADR concerning the annual technical inspection of the vehicles contains requirements for the inspection of each vehicle of the foreseen combination. For the operation of the vehicles, no comparable provision can be found.

Proposal

6. Depending on the outcome of the discussion, the following text could be added to section 7.4.2 of ADR:

“If substances for which an AT vehicle is prescribed are carried in a trailer or semi-trailer, the drawing vehicle may be a AT, FL or OX vehicle.

If substances for which an OX vehicle is prescribed are carried in a trailer or semi-trailer, the drawing vehicle may be a FL or OX vehicle.

If substances for which a FL vehicle is prescribed are carried in a trailer or semi-trailer, the drawing vehicle shall be a FL vehicle.

The connection of the electrical wires between the drawing vehicle and the trailer or semi-trailer shall comply with the most stringent requirements applicable to any of the vehicles.

For the operation of EX/II and EX/III vehicles, see 7.2.4, special provision V2.”
7. In 9.1.2.3, the part of the sentence reading

“If these vehicles are trailers or semi trailers coupled behind a drawing vehicle, the
drawing vehicle shall be subject to technical inspection for the same purposes”

can be deleted.

Justification

8. Before the restructuring of ADR this subject was regulated in a satisfying way in
marginal 10282. This regulation was taken over in 9.1.2.3. Following the partition of provisions
concerning construction and inspection on one side and provisions concerning operation on the
other side during the restructuring of ADR, it seems appropriate to regulate the operation of the
possible combination of vehicles in section 7.4.2.

Safety implications

9. Improvement of safety by regulating the use of appropriate types of vehicles.

Feasibility

10. No problem.

Enforceability

11. No problem.