Economic Commission for Europe
Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Ninety-first session
Geneva, 8–11 November 2011
Item 5(a) of the provisional agenda

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

Sub-section 9.2.2.6.3:

Electrical connections – additional information and proposals related to ECE/TRANS/WP.152011/9 from Sweden

Transmitted by the Government of Sweden

Introduction

In document 2011/9 (+ INF.3) Sweden propose amendments related to the requirements set out in sub-section 9.2.2.6.3. The problems described in this document were discovered this summer, close to the deadline for submitting official documents to the 91st session with WP.15. Since the transitional period for applying the requirements of Part 9 of ADR 2009 will cease 31 March 2012, it is important that WP.15 comes to a decision concerning this matter as soon as possible. However, during this autumn new facts have been revealed which should, in addition to the ones described in 2011/9, be taken into consideration.

The problems described in 2011/9, to fulfil the requirement in ISO 4009 concerning the minimum distance between the electrical connections between truck and semitrailer, also exist when applying ISO 7638:2003. This means that both standards specified as mandatory in sub-section 9.2.2.6.3, refers to ISO 4009 (see paragraphs 2 and 5.2 in ISO 12098:2004 and ISO 7638:2003).

The application of ISO 4009 is only mandatory for vehicles carrying dangerous goods on EX/III- and FL-vehicles. There are no such requirements for other kinds of vehicles, neither for ADR-vehicles nor for any kind of vehicle regulated by WP.29.

Furthermore, both standards referred to as mandatory in sub-section 9.2.2.6.3 include undated references to ISO 4009. This is worrying since it means that the latest edition of ISO 4009 (including any amendments) applies. Paragraphs 2 in ISO 12098:2004 and ISO 7638:2003 states the following:

“The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.”

Consequently, if ISO replaces the current ISO 4009 with a revised edition, its conditions must be met by any EX/III- and FL-vehicle, regardless of its date of construction. This could of course be avoided by allowing for transitional measures or other kinds of
exemptions in ADR, but such procedure would require that ISO’s work with ISO 4009 must be closely, and continuously, examined by WP.15.

For the aforementioned reasons, Sweden would like to extend the scope of our proposal in 2011/9 to not only allow for exemption from paragraph 3.1, figure 4 in ISO 4009, but from the whole standard.

Since it is essential that a decision is taken as soon as possible, we propose a second alternative in case the first one cannot be accepted.

Proposal

In 9.2.2.6.3

Alternative 1: After “ISO 12098:2004” and “ISO 7638:2003” insert a footnote “X” to read as follows:

“(X) ISO 4009, referred to in this standard, need not be applied with.”

Alternative 2: After “ISO 12098:2004” and “ISO 7638:2003” insert a footnote “X” to read as follows:

“(X) The requirement in ISO 4009 (paragraph 3.1, figure 4), referred to in this standard, that the locations for electrical and pneumatic connections shall be ≥ 350 mm between the connector on the truck and the connector on the semitrailer for articulated vehicles, need not be applied with.”