Comments and proposals on ECE/TRANS/WP.15/2015/15 - Proposal for amendment by the informal working group on the electrical system of vehicles carrying dangerous goods

Transmitted by the Government of Romania

Introduction

1. After analysing the amendments proposed by the Netherlands in their document ECE/TRANS/WP.15/2014/2 - Proposal for amendment by the informal working group on the electrical system of vehicles carrying dangerous goods, Romania has some comments and proposals that could be considered by the WP.15.

2. In our proposals, the existing wording of the Netherlands proposals or the existing wording in ADR, as the case, is given in *Italic*, new wording in **bold underlined** and deleted wording stricken out.

3. To avoid any confusion, the original numbering of the proposals from the document ECE/TRANS/WP.15/2014/2 was kept.

Proposals

Part 1 - Chapter 1.6

4. In order to have a clearer wording and to align the text of the 1.6.5.16 with the text of 9.2.2.2.1 we propose the following wording:

1.6.5.16 Vehicles first registered or entering into service before 1 April 2018 in accordance with the regulation in force up to 31 December 2016 that do not comply with subsection 9.2.2.8.5 or standards EN 6722 ISO 6722-1:2011, Cor 01:2012 or ISO 6722-2:2013 for cables of subsection 9.2.2.2.1 may continue to be used, but comply with the requirements applicable until 31 December 2016, may continue to be used.

5. Considering that the existing type OX vehicles may continue to be used and by deleting the OX vehicles in 9.1.2.3 no provisions remain regarding the annual technical inspection for these vehicles, we propose a new transitional measure in 1.6.5 to read:

1.6.5.xx As regards the annual technical inspection of the vehicles first registered or entering into service before 1 April 2018 approved specifically as vehicle type OX, the requirements of Part 9 in force up to 31 December 2016 may still be applied.
6. Considering that the existing type OX vehicles may continue to be used and by deleting the OX vehicles in 9.1.3.1 no provisions remain regarding the existing certificates of approval for these vehicles, we propose a new transitional measure in 1.6.5 to read:

1.6.5.xy Certificates of approval for OX type vehicles which conform to the model shown in 9.1.3.5 applicable up to 31 December 2016 may continue to be used.

Part 5 Chapter 9.2

Proposal 5.2

7. Because of the introduction of the wording “drawing vehicles” in the text of 9.2.6 (see proposal 5.5), the title of this point and the 7th column in the table of subsection 9.2.1.1 must be amended accordingly. We considered switching between trailers and motor vehicles to conform to the natural order.

<table>
<thead>
<tr>
<th>9.2.6</th>
<th>COUPLING DEVICES FOR MOTOR VEHICLES AND TRAILERS</th>
<th>X</th>
<th>X</th>
<th>X³</th>
<th>X³</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applicable to coupling devices of motor vehicles and trailers and motor vehicles first registered (or which entered into service if registration is not mandatory) after 1 April 2018.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Proposal 5.3

9.2.2.2.1 Cables

8. In the second paragraph of the subsection 9.2.2.2.1 there is a reference to ISO 16750-1:2006 in connection with temperature range. ISO 16750-1:2006 (Road vehicles - Environmental conditions and testing for electrical and electronic equipment - Part 1: General) contains: general terms and definitions, functional status classification, general test conditions, etc. ISO 16750-4:2010 (Road vehicles - Environmental conditions and testing for electrical and electronic equipment- Part 4: Climatic loads) contains, among others, operating temperature ranges, temperature tests and recommended operating temperature range for equipment depending on the mounting location.

Having in view this, we propose to amend the text of the second paragraph in subsection 9.2.2.2.1, to read:

The cables shall be suitable for the conditions in the area of the vehicle, such as temperature range and fluid compatibility conditions as given in ISO 16750-1:2006 ISO 16750-4:2010 and ISO 16750-5:2010, they are intended to be used.

Proposal 5.5

9. Because of the introduction of the wording “drawing vehicles” in the text of 9.2.6, the title of this subsection shall be amended accordingly. We consider that the wording “drawing vehicles” must be replaced with “motor vehicles” because this is the wording used throughout the table 9.2.1.1. We also considered switching between trailers and motor vehicles of this subsection for conforming to the natural order.

Replace the wording of section 9.2.6 by:

9.2.6 Coupling devices for motor vehicles and trailers

Coupling devices for trailers and drawing of motor vehicles and trailers shall comply with the technical requirements of ECE Regulation No. 55 as amended, in accordance with the dates of application specified therein.
Part 8 - table of contents of Volume II of ADR

10. See the explanation of the point No. 9.

Replace in the table of contents 9.2.6 by:

“9.2.6 Coupling devices for motor vehicles and trailers”.

Consequential amendments

11. Because of the deletion of OX vehicles, there are other consequential amendments to be made in the ADR text. Therefore we propose the following amendments:

12. In table of contents for Volume II on the page xv of Volume I ADR, amend in the heading of Chapter 9.7 “EX/III, FL, OX and AT vehicles” to read “EX/III, FL and AT vehicles”

13. In table of contents of Volume II on the page xii of Volume II ADR, amend in the heading of 9.1.2 “EX/II, EX/III, FL, OX and AT vehicles and MEMUs” to read “EX/II, EX/III, FL and AT vehicles and MEMUs”.


15. In the Part 9, Chapter 9.2, amend subsection 9.2.3.1.2 to read:

9.2.3.1.2 EX/III, FL, OX and AT vehicles shall fulfil the requirements of ECE Regulation No.13, Annex 5.