Carriage of vehicles engines and machinery – harmonisation with UN Model Regulations – comments on ECE/TRANS/WP.15/AC.1/2015/23 add1

Transmitted by the Government of France

Introduction

1. The government of France appreciates the comment from Germany in INF26. In our initial proposal we tried to stick to the usual principle consisting to implement text that would not modify the wording coming from the UNMR.

2. However we recognize that this text could be improved editorially and especially for the paragraph dealing with exemptions for prototypes and small productions. In addition we agree that special provisions 312 and 385 contain redundant text.

3. We believe that the concepts in the German document INF 26 could be improved even further. We also got some comments in a discussion with OICA.

4. The paragraph mentioning that prototypes and small productions batteries need not to be in conformity with 2.2.9.1.7 a) is linked to both vehicles and machines (UN 3166, 3171, 3528, 3529, 3530) therefore it is easier to place this text in one separate special provision that may be assigned to all relevant UN entries. And doesn’t need to be repeated in different other special provisions.

5. However some parts of INF26 would, in our view, create some problems or generate further confusion.

6. Concerning the merging of special provisions. It is not relevant to merge SP240 with 312 and 385. because SP 240 also deals with equipment and aims at distinguishing between vehicles and equipment as well as defining vehicles. Examples in SP240 are not relevant to the UN 3166. But it is very relevant to merge SP312 and 385.

7. text concerning non road mobile machinery should be kept if we want to keep the current exemption for them. Otherwise they would automatically fall under one of the new UN entries (3528, 3529, 3530). Te new special provision to achieve this should be kept separate from other issues and should not be used to clarify SP363. If there are proposal to delete the exemption for these non road mobile machinery they should be supported by appropriate new data justifying a substantial change in the regulations, and checked with the relevant industry representatives.
8. In order to facilitate discussions in the Joint meeting we would like to provide a consolidated document where most of the changes in INF26 are taken on board.

9. However we could not manage to include some of them in a consistent way:

- Mixing provisions of SP240 and those for UN 3166 (for the reason mentioned above)

- The condition that prototypes and small production batteries are dispensed from 2.2.9.7 a) only if the vehicle is manufactured and approved according to the provisions applied in the country of manufacture or country of use. This sounds rather strange as this requirement is not mentioned in the general case, transport regulation doesn’t seem to be the right place to regulate vehicle conformity. Furthermore prototype batteries are often installed in prototypes vehicle carried for testing (of the vehicle), so precisely these prototypes vehicles should not be subject to that conformity requirement.

10. We provide two options. One with special provisions as they are in the UNMR and one with a specific special provision merging SP 312 and 385. If this is agreed by the joint meeting these improvements should be presented for adoption by the UN subcommittee. We have seen that there is a paper submitted to IMO with some of these modifications to be included in IMDG (see attached copy for information of the Joint meeting). A similar decision at that level would be a good reason for the UN sub committee to act.

11. To avoid to long text only the proposals that are different in option 2 are detailed

**Proposals**

**Option 1**

*Keeping the special provisions as they are in the UN model rules.*

**Proposal 1**

Amend Table A for UN 3166 and 3171, as shown in the annex.

Add the three new entries UN 3528, 3529, 3530 as proposed in document ECE/TRANS/WP.15/AC.1/2015/23/Add.1

**Proposal 2**

Introduce special provisions 240 and 312, and 385 of the UN Recommendations into Chapter 3.3 of RID/ADR as they appear in the 19th revised edition of the UN Model Regulations, except for some editorial adaptations, as follows:

**240** This entry only applies to vehicles powered by wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries and equipment powered by wet batteries or sodium batteries transported with these batteries installed. Lithium batteries shall meet the requirements of 2.2.9.1.7, except as provided in special provision 6YY

For the purpose of this special provision, vehicles are self-propelled apparatus designed to carry one or more persons or goods. Examples of such vehicles are electrically-powered cars, motorcycles, scooters, three- and four-wheeled vehicles or motorcycles, trucks, locomotives, bicycles (pedal cycles with an electric motor) and other vehicles of this type (e.g. self-balancing vehicles or vehicles not equipped with at least one seating position), wheel chairs, lawn tractors, self-propelled farming and construction equipment,
boats and aircraft. This includes vehicles transported in a packaging. In this case some parts of the vehicle may be detached from its frame to fit into the packaging.

Examples of equipment are lawnmowers, cleaning machines or model boats and model aircraft. Equipment powered by lithium metal batteries or lithium ion batteries shall be consigned under the entries UN 3091 LITHIUM METAL BATTERIES CONTAINED IN EQUIPMENT or UN 3091 LITHIUM METAL BATTERIES PACKED WITH EQUIPMENT or UN 3481 LITHIUM ION BATTERIES CONTAINED IN EQUIPMENT or UN 3481 LITHIUM ION BATTERIES PACKED WITH EQUIPMENT, as appropriate. Hybrid electric vehicles powered by both an internal combustion engine and wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the battery(ies) installed shall be consigned under the entries UN 3166 VEHICLE, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FLAMMABLE LIQUID POWERED, as appropriate. Vehicles which contain a fuel cell shall be consigned under the entries UN 3166 VEHICLE, FUEL CELL, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FUEL CELL, FLAMMABLE LIQUID POWERED, as appropriate.

Vehicles may contain other dangerous goods than batteries (e.g. fire extinguishers, compressed gas accumulators or safety devices) required for their functioning or safe operation without being subject to any additional requirements for these other dangerous goods, unless otherwise specified in RID/ADR/ADN."

“312 Vehicles powered by a fuel cell engine shall be consigned under the entries UN No. 3166 VEHICLE, FUEL CELL, FLAMMABLE GASPOWERED or UN No. 3166 VEHICLE, FUEL CELL, FLAMMABLE LIQUID POWERED, as appropriate. These entries include hybrid electric vehicles powered by both a fuel cell and an internal combustion engine with wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the battery(ies) installed.

Other vehicles which contain an internal combustion engine shall be consigned under the entries UN 3166 VEHICLE, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FLAMMABLE LIQUID POWERED, as appropriate. These entries include hybrid electric vehicles powered by both an internal combustion engine and wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the battery(ies) installed.

Lithium batteries shall meet the requirements of 2.2.9.1.7, except as provided in special provision 6XX

385 This entry applies to vehicles powered by flammable liquid or gas internal combustion engines or fuel cells.

Hybrid electric vehicles powered by both an internal combustion engine and wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the batteries installed shall be consigned under this entry. Vehicles powered by wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the batteries installed, shall be consigned under the entry UN No. 3171 BATTERYPOWERED VEHICLE (see special provision 240).

For the purpose of this special provision, vehicles are self-propelled apparatus designed to carry one or more persons or goods. Examples of such vehicles are cars, motorcycles, trucks, locomotives, scooters, three- and four-wheeled vehicles or motorcycles, lawn tractors, self-propelled farming and construction equipment, boats and aircraft.

Dangerous goods such as batteries, air bags, fire extinguishers, compressed gas accumulators, safety devices and other integral components of the vehicle that are necessary for the operation of the vehicle or for the safety of its operator or passengers, shall be securely installed in the vehicle and are not otherwise subject to these Regulations. However, lithium batteries shall meet the requirements of 2.2.9.1.7 , except as provided in special provision 6YY
Proposal 3

Modify Special provisions 363 as proposed in document ECE/TRANS/WP.15/AC.1/2015/23/Add.1 with three options for para. (g)(vi) to be discussed:

363 (a) This entry applies to engines or machinery, powered by fuels classified as dangerous goods via internal combustion systems or fuel cells (e.g. combustion engines, generators, compressors, turbines, heating units, etc.), in quantities above those specified in column (7a) of Table A of Chapter 3.2, except those which are assigned to UN No. 3166 or their equipments mentioned in special provision 6XX.

(b) Engines or machinery which are empty of liquid or gaseous fuels and which do not contain other dangerous goods, are not subject to RID/ADR/ADN.

NOTE 1: An engine or machinery is considered to be empty of liquid fuel when the liquid fuel tank has been drained and the engine or machinery cannot be operated due to a lack of fuel. Engine or machinery components such as fuel lines, fuel filters and injectors do not need to be cleaned, drained or purged to be considered empty of liquid fuels. In addition, the liquid fuel tank does not need to be cleaned or purged.

NOTE 2: An engine or machinery is considered to be empty of gaseous fuels when the gaseous fuel tanks are empty of liquid (for liquefied gases), the positive pressure in the tanks does not exceed 2 bar and the fuel shut-off or isolation valve is closed and secured.

(c) Engines and machinery containing fuels meeting the classification criteria of Class 3 shall be consigned under the entries UN No. 3528 ENGINE, INTERNAL COMBUSTION, FLAMMABLE LIQUID POWERED or UN No. 3528 ENGINE, FUEL CELL, FLAMMABLE LIQUID POWERED or UN No. 3528 MACHINERY, INTERNAL COMBUSTION, FLAMMABLE LIQUID POWERED or UN No. 3528 MACHINERY, FUEL CELL, FLAMMABLE LIQUID POWERED, as appropriate.

(d) Engines and machinery containing fuels meeting the classification criteria of flammable gases of Class 2 shall be consigned under the entries UN No. 3529 ENGINE, INTERNAL COMBUSTION, FLAMMABLE GAS POWERED or UN No. 3529 ENGINE, FUEL CELL, FLAMMABLE GAS POWERED or UN No. 3529 MACHINERY, INTERNAL COMBUSTION, FLAMMABLE GAS POWERED or UN No. 3529 MACHINERY, FUEL CELL, FLAMMABLE GAS POWERED, as appropriate.

Engines and machinery powered by both a flammable gas and a flammable liquid shall be consigned under the appropriate UN No. 3529 entry.

(e) Engines and machinery containing liquid fuels meeting the classification criteria of 2.2.9.1.10 for environmentally hazardous substances and not meeting the classification criteria of any other class shall be consigned under the entries UN No. 3530 ENGINE, INTERNAL COMBUSTION or UN No. 3530 MACHINERY, INTERNAL COMBUSTION, as appropriate.

(f) Engines or machinery may contain other dangerous goods than fuels (e.g. batteries, fire extinguishers, compressed gas accumulators or safety devices) required for their functioning or safe operation without being subject to any additional requirements for these other dangerous goods, unless otherwise specified in RID/ADR/ADN. However, lithium batteries shall meet the requirements of 2.2.9.1.7, except as provided in special provision 6YY.
(g) The engines or machinery are not subject to any other requirements of RID/ADR/ADN if the following requirements are met:

(i) The engine or machinery, including the means of containment containing dangerous goods, shall be in compliance with the construction requirements specified by the competent authority of the country of manufacture;

(ii) Any valves or openings (e.g. venting devices) shall be closed during carriage;

(iii) The engines or machinery shall be oriented to prevent inadvertent leakage of dangerous goods and secured by means capable of restraining the engines or machinery to prevent any movement during carriage which would change the orientation or cause them to be damaged;

(iv) for UN No. 3528 and UN No. 3530:

Where the engine or machinery contains more than 60 l of liquid fuel and has a capacity of not more than 450 l, the labelling requirements of 5.2.2 shall apply.

Where the engine or machinery contains more than 60 l of liquid fuel and has a capacity of more than 450 l but not more than 3 000 l, it shall be labelled on two opposing sides in accordance with 5.2.2.

Where the engine or machinery contains more than 60 l of liquid fuel and has a capacity of more than 3 000 l, it shall be placarded on two opposing sides. Placards shall correspond to the labels required in Column (5) of Table A of Chapter 3.2 and shall conform to the specifications given in 5.3.1.7. Placards shall be displayed on a background of contrasting colour, or shall have either a dotted or solid outer boundary line.

(v) for UN No. 3529:

Where the fuel tank of the engine or machinery has a water capacity of not more than 450 l, the labelling requirements of 5.2.2 shall apply.

Where the fuel tank of the engine or machinery has a water capacity of more than 450 l but not more than 1 000 l, it shall be labelled on two opposing sides in accordance with 5.2.2.

Where the fuel tank of the engine or machinery has a water capacity of more than 1 000 l, it shall be placarded on two opposing sides. Placards shall correspond to the labels required in Column (5) of Table A of Chapter 3.2 and shall conform to the specifications given in 5.3.1.7. Placards shall be displayed on a background of contrasting colour, or shall have either a dotted or solid outer boundary line.

[Option 1:

“(vi) A transport document in accordance with 5.4 is required, except for UN No. 3528 and UN No. 3530, where a transport document is only required when the engine or machinery contains more than 60 l of liquid fuels.

Option 2:

(vi) A transport document in accordance with 5.4 is required, except for UN No. 3528 and UN No. 3530, where a transport document is only required when the engine or machinery contains more than 1000 l of liquid fuels.

Option 3:

(vi) A transport document in accordance with 5.4 is required only when the engine or machinery contains more than 1000 l of liquid fuels, for UN 3528 and UN 3530, or has a water capacity of more than 1000 l, for UN 3529.

[This transport document shall contain the following additional statement “Transport in accordance with special provision 363”. (see also 5.4.1.1.21)]

(comment: the provision in square brackets already appears in 5.4.1.1.21. It may not be necessary to stay in the special provision but a cross-reference might help for user friendliness)

Proposal 4

Introduce two new special provisions into Chapter 3.3, as follows:

“6XX Vehicles assigned to UN 3166 or UN 3171 [and battery powered equipment assigned to UN 3171] in conformity with special provisions 240, 312 and 385 including trailers, as well as any dangerous goods they contain that are necessary for their operation or the operation of their equipment, when carried as a load, are not subject to any other provisions of [RID/ADR/ADN], provided the following conditions are met:

(i) For liquid fuels, any fuel cocks between the engine or equipment and the fuel tank shall be closed during carriage unless it is essential for the equipment to remain operational. Where appropriate, the vehicles or other means of conveyance shall be loaded upright and secured against falling;

(ii) For gaseous fuels, the fuel cock between the gas tank and engine shall be closed and the electric contact open.

(iii) Metal hydride storage systems shall be approved by the competent authority of the country of manufacture, if the country of manufacture is not a contracting party to RID/ADR/ADN the approval shall be recognized by the competent authority of a contracting party to RID/ADR/ADN

(iv) The provisions of (i) and (ii) do not apply to vehicles which are empty of liquid or gaseous fuels,

NOTE 1: A vehicle is considered to be empty of liquid fuel when the liquid fuel tank has been drained and the vehicle cannot be operated due to a lack of fuel. Vehicle components such as fuel lines, fuel filters and injectors do not need to be cleaned, drained or purged to be considered empty of liquid fuels. In addition, the liquid fuel tank does not need to be cleaned or purged.
NOTE 2: A vehicle is considered to be empty of gaseous fuels when the gaseous fuel tanks are empty of liquid (for liquefied gases), the positive pressure in the tanks does not exceed 2 bar and the fuel shut-off or isolation valve is closed and secured.”

“6YY (a) 2.2.9.1.7 a) does not apply when pre-production prototype lithium batteries or lithium batteries of a small production run, consisting of not more than 100 batteries, are installed in the vehicle, engine, machine or non road mobile machinery

(b) 2.2.9.1.7 a) does not apply to lithium batteries installed in damaged or defective vehicles, engine, machines or non road mobile machinery, under the following conditions:

(i) Damaged and defective vehicles, engines machines or non road mobile machinery, may be transported as specified respectively in special provisions 363, 6XX, or 6ZZ, if the damage or defect has no relevant impact on the safety of the battery.

(ii) In the case of not being able to verify the status of damage, the lithium battery has to be removed and transported according to special provision 376. However if removal is not possible under appropriate safety conditions. To be towed or carried away, vehicles, machines or non road mobile machinery may be carried as specified in (i)”

Proposal 5

Introduce a new special provision into Chapter 3.3, as follows:

“6ZZ Non-road mobile machinery which is carried as a load, and not assigned to UN 3166 or UN 3171 in conformity with special provisions 240, or 312 and 385 containing fuel destined for their propulsion or the operation of any of its equipment is not subject to any other requirements of [RID/ADR/ADN], provided the following conditions are met:

The fuel may be carried in fixed fuel tanks connected directly to the vehicle engine and/or equipment. These fixed fuel tanks shall meet the legal requirements;

Where appropriate, this machinery shall be loaded upright and secured against falling.

Non road mobile machinery may contain other dangerous goods than fuels (e.g. batteries, fire extinguishers, compressed gas accumulators or safety devices) required for their functioning or safe operation without being subject to any additional requirements for these other dangerous goods, unless otherwise specified in RID/ADR/ADN. However, lithium batteries shall meet the requirements of 2.2.9.1.7, except as provided in special provision 6YY


Proposal 6

Consequential amendments:

1) Delete 1.1.3.2 b)
2) Delete 1.1.3.3 b) and c)
3) Delete the final note in 2.2.9.1.7
4) For all entries to which SP 363 is currently assigned, delete 363 in column (6) as proposed in ECE/TRANS/WP.15/AC.1/2015/23/Add.1, page 11.
5) modify special provision 356 as follows:

“356 Metal hydride storage systems intended to be installed in vehicles, vessels or aircrafts shall be approved by the competent authority of the country of manufacture before acceptance for carriage. The transport document shall include an indication that the package was approved by the competent authority of the country of manufacture or a copy of the competent authority of the country of manufacture approval shall accompany each consignment.

1 If the country of manufacture is not a Contracting Party to ADR, the approval shall be recognized by the competent authority of a Contracting Party to ADR.”

Option 2

Merging special provisions 312 and 385 in one specific RID ADR ADN special provision

Proposal 1

Amend Table A for UN 3166 and 3171, as shown in the annex.

Add the three new entries UN 3528, 3529, 3530 as proposed in document ECE/TRANS/WP.15/AC.1/2015/23/Add.1

Proposal 2

a) Mark special provisions 312 and 385 as “reserved”, introduce special provision 240 of the UN Recommendations into Chapter 3.3 of RID/ADR as it appears in the 19th revised edition of the UN Model Regulations, except for some editorial adaptations, as follows:

“240 This entry only applies to vehicles powered by wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries and equipment powered by wet batteries or sodium batteries transported with these batteries installed. Lithium batteries shall meet the requirements of 2.2.9.1.7, except as provided in special provision 6YY

For the purpose of this special provision, vehicles are self-propelled apparatus designed to carry one or more persons or goods. Examples of such vehicles are electrically-powered cars, motorcycles, scooters, three- and four-wheeled vehicles or motorcycles, trucks, locomotives, bicycles (pedal cycles with an electric motor) and other vehicles of this type (e.g. self-balancing vehicles or vehicles not equipped with at least one seating position), wheel chairs, lawn tractors, self-propelled farming and construction equipment, boats and aircraft. This includes vehicles transported in a packaging. In this case some parts of the vehicle may be detached from its frame to fit into the packaging.

Examples of equipment are lawnmowers, cleaning machines or model boats and model aircraft. Equipment powered by lithium metal batteries or lithium ion batteries shall be consigned under the entries UN 3091 LITHIUM METAL BATTERIES CONTAINED IN EQUIPMENT or UN 3091 LITHIUM METAL BATTERIES PACKED WITH EQUIPMENT or UN 3481 LITHIUM ION BATTERIES CONTAINED IN EQUIPMENT or UN 3481 LITHIUM ION BATTERIES PACKED WITH EQUIPMENT, as appropriate.
Hybrid electric vehicles powered by both an internal combustion engine and wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the battery(ies) installed shall be consigned under the entries UN 3166 VEHICLE, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FLAMMABLE LIQUID POWERED, as appropriate. Vehicles which contain a fuel cell shall be consigned under the entries UN 3166 VEHICLE, FUEL CELL, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FUEL CELL, FLAMMABLE LIQUID POWERED, as appropriate.

Vehicles may contain other dangerous goods than batteries (e.g. fire extinguishers, compressed gas accumulators or safety devices) required for their functioning or safe operation without being subject to any additional requirements for these other dangerous goods, unless otherwise specified in RID/ADR/ADN."

b) Introduce a new special provision 6WW in chapter 3.3 as follows

"6WW This entry applies to vehicles powered by flammable liquid or gas internal combustion engines or fuel cells.

Vehicles powered by a fuel cell engine shall be consigned under the entries UN No. 3166 VEHICLE, FUEL CELL, FLAMMABLE GAS POWERED or UN No. 3166 VEHICLE, FUEL CELL, FLAMMABLE LIQUID POWERED, as appropriate. These entries include hybrid electric vehicles powered by both a fuel cell and an internal combustion engine with wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the battery(ies) installed.

Other vehicles which contain an internal combustion engine shall be consigned under the entries UN 3166 VEHICLE, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FLAMMABLE LIQUID POWERED, as appropriate. These entries include hybrid electric vehicles powered by both an internal combustion engine and wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the battery(ies) installed.

Vehicles powered by wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the batteries installed, shall be consigned under the entry UN No. 3171 BATTERYPOWERED VEHICLE (see special provision 240).

For the purpose of this special provision, vehicles are self-propelled apparatus designed to carry one or more persons or goods. Examples of such vehicles are cars, motorcycles, trucks, locomotives, scooters, three- and four-wheeled vehicles or motorcycles, lawn tractors, self-propelled farming and construction equipment, boats and aircraft.

Dangerous goods such as batteries, air bags, fire extinguishers, compressed gas accumulators, safety devices and other integral components of the vehicle that are necessary for the operation of the vehicle or for the safety of its operator or passengers, shall be securely installed in the vehicle and are not otherwise subject to these Regulations However, lithium batteries shall meet the requirements of 2.2.9.1.7 , except as provided in special provision 6YY."

Proposal 3

SAME AS OPTION 1

Proposal 4

Introduce two new special provision 6XX and 6YY into Chapter 3.3, as follows:
“6XX Vehicles assigned to UN 3166 or UN 3171, [and battery powered equipment assigned to UN 3171] in conformity with special provisions 240 and 6WW including trailers, as well as any dangerous goods they contain that are necessary for their operation or the operation of their equipment, when carried as a load, are not subject to any other provisions of [RID/ADR/ADN], provided the following conditions are met:...

ALL OTHER PARAGRAPHS SAME AS OPTION

“6YY SAME TEXT AS OPTION 1”

Proposal 5

Introduce a new special provision into Chapter 3.3, as follows:

“6ZZ Non-road mobile machinery which is carried as a load, and not assigned to UN 3166 or UN 3171 in conformity with special provisions 240, or 6WW containing fuel destined for their propulsion or the operation of any of its equipment is not subject to any other requirements of [RID/ADR/ADN], provided the following conditions are met:

ALL OTHER PARAGRAPHS SAME AS OPTION 1

Proposal 6

SAME AS OPTION 1.
### Annex 1

#### Resulting amendments to Table A OPTION 1

| (1) | (2) | (3a) | (3b) | (4) | (5) | (6) | (7a) | (7b) | (8) | (9a) | (9b) | (10) | (11) | (12) | (13) | (14) | (15) | (16) | (17) | (18) | (19) | (20) |
|-----|-----|------|------|-----|-----|-----|------|------|-----|------|------|------|------|------|------|------|------|------|------|------|------|
| 3166 | VEHICLE, FLAMMABLE GAS POWERED or VEHICLE, FLAMMABLE LIQUID POWERED or VEHICLE, FUEL CELL, FLAMMABLE GAS POWERED or VEHICLE, FUEL CELL, FLAMMABLE LIQUID POWERED | 9 | M11 | 312 | 385 | 6XX | 6YY | 0 | E0 |
| 3171 | BATTERY POWERED VEHICLE OR BATTERY POWERED EQUIPMENT | 9 | M11 | 240 | 6XX | 6YY | 0 | E0 |
| 3528 | ENGINE, INTERNAL COMBUSTION, FLAMMABLE LIQUID POWERED or ENGINE, FUEL CELL, FLAMMABLE LIQUID POWERED or MACHINERY, INTERNAL COMBUSTION, FLAMMABLE LIQUID POWERED or MACHINERY, FUEL CELL, FLAMMABLE LIQUID POWERED | 3 | 3 | 363 | 0 | E0 | P005 |
### Resulting amendments to Table A OPTION 2

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| 317 | 1 | BATTERY POWERED VEHICLE OR BATTERY POWERED EQUIPMENT | 9 | M1 | 1 | 240 | 6XX | 6YY | 0 | E0 |  |  |  |  |  |  |  |  |  |  |  |  |
| 3528 |  | ENGINE, INTERNAL COMBUSTION, FLAMMABLE LIQUID POWERED or ENGINE, FUEL CELL, FLAMMABLE LIQUID POWERED or MACHINERY, INTERNAL COMBUSTION, FLAMMABLE LIQUID POWERED | 3 | 3 | 363 | 6YY | 6ZZ | 0 | E0 | P00 | 5 |  |  |  |  |  |  |  |  |  |  |  |
| 3529 |  | ENGINE, INTERNAL COMBUSTION, FLAMMABLE GAS POWERED or ENGINE, FUEL CELL, FLAMMABLE GAS POWERED or MACHINERY, INTERNAL COMBUSTION, FLAMMABLE GAS POWERED | 2 | 2 | 1 | 363 | 6YY | 6ZZ | 0 | E0 | P00 | 5 |  |  |  |  |  |  |  |  |  |  |  |</p>
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