

## **Economic Commission for Europe**

### **Inland Transport Committee**

#### **Working Party on the Transport of Dangerous Goods**

**103rd session**

Geneva, 6-10 November 2017

Item 5 (a) of the provisional agenda

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

**2 November 2017**

### **Comments on ECE/TRANS/WP.15/2017/20 (Clarification of the requirements in 9.3.4.2 for EX/II and EX/III vehicles)**

#### **Transmitted by the Government of Finland**

Finland supports the principle to clarify the requirements in 9.3.4.2. The objective should be that we have same interpretation in all ADR countries.

We should develop the requirements in such a way that we have clear requirements that shall be fulfilled rather than a description of the structure or structural material that meets the requirements. We need to take into account also future developments in materials.

If insulation against heat is a requirement it would be advisable to clearly state that in regulations in order to make it easier to find right material and construction. It has been questioned if all kind of metal structures need to be covered and whether the whole inside of the body required to be covered if some part in it is metal.

It is not demonstrated that the existing approved vehicles with a construction in accordance with 9.3.4.2 are dangerous in such a way that the use of these vehicle should be limited. We are of the opinion that if a transitional measure is needed it should stipulate that these vehicles may still be used in the future.

We would also like to draw attention to 7.1.5 of ADR. Amendments in 9.3.4.2 may have effects on the requirements for containers.

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