Economic Commission for Europe
Inland Transport Committee
Working Party on the Transport of Dangerous Goods
105th session
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Item 5 (a) of the provisional agenda
Proposals for amendments to annexes A and B of ADR:
Construction and approval of vehicles

Implementation of the requirements of 9.2.2.1 ADR on cables

Transmitted by the Government of France*

Summary

Executive summary: The new requirements of 9.2.2.1 ADR on the cables used in the different electrical circuits of EX, FL and AT vehicles seem to pose some problems of application.
An exchange on these subjects would be desirable.

Background documents: ECE/TRANS/257

Introduction

1. The Working Group adopted, for entry into force in 2017, amendments to chapter 9.2 of ADR concerning the construction of vehicles, among other things introducing in 9.2.2.1 a reference to ISO standards for the conformity of cables used in the different electric circuits.

2. Without calling into question the justification for this requirement, it appears to be quite difficult to obtain cables conforming to these standards as suppliers demand substantial orders of at least 100 km, which can be problematic, particularly for manufacturers of tank vehicles who need only smaller quantities.

* In accordance with the programme of work of the Inland Transport Committee for 2018–2019 (ECE/TRANS/WP.15/237, annex V (9.1)).
3. Moreover, suppliers issue certificates on their product’s compliance with the standard but the cables carry no batch number or other reference. There is no specific marking on the cables. This raises the question of verification of compliance.

4. In addition, the requirements for the cables now apply to EX/II vehicles, which was not previously the case. These may be commercial vehicles with a maximum mass not exceeding 3.5 tonnes or vans with a maximum mass not exceeding 12 tonnes, and with a load compartment equipped to meet the requirements of chapter 9.3. The original electrical wiring of these vehicles may not be in conformity with 9.2.2.2.1; it has therefore to be completely replaced in order to comply.

Discussion

5. We would like to know the opinion of the members of the Working Group on the various points raised in paragraphs 2 to 4 above.