Use of a transport unit comprising a dolly-axle for a carriage according to 1.1.3.6 of ADR

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1. 1.1.3.6 defines exemptions related to quantities carried per transport unit.

2. 1.1.3.6.2 specifies that when the quantity of dangerous goods carried on a transport unit does not exceed certain values, they may be carried in packages in one transport unit without application of the following provisions:
   - Chapter 1.10 except for Class 1 explosives of UN Nos. 0029, 0030, 0059, 0065, 0073, 0104, 0237, 0255, 0267, 0288, 0289, 0290, 0360, 0361, 0364, 0365, 0366, 0439, 0440, 0441, 0455, 0456 and 0500 and except for Class 7 excepted packages of UN Nos. 2910 and 2911 if the activity level exceeds the A2 value;
   - Chapter 5.3;
   - Section 5.4.3;
   - Chapter 7.2, except for V5 and V8 of 7.2.4;
   - CV1 of 7.5.11;
   - Part 8 except for 8.1.2.1 (a), 8.1.4.2 to 8.1.4.5, 8.2.3, 8.3.3, 8.3.4, 8.3.5, Chapter 8.4, S1(3) and (6), S2(1), S4, S5, S14 to S21 and S24 of Chapter 8.5;
   - Part 9.

3. As a result, except for 8.1.2.1 (a) and 8.1.4.2 to 8.1.4.5, the requirements in Chapter 8.1 on general requirements concerning transport units and equipment on board do not apply to a carriage under 1.1.3.6. This means that Section 8.1.1 which states that « A transport unit loaded with dangerous goods may in no case include more than one trailer (or semi-trailer). » does not apply either.

4. However, according to Chapter 1.2, "Transport unit" means a motor vehicle without an attached trailer, or a combination consisting of a motor vehicle and an attached trailer.

5. It therefore seems that even if 8.1.1 does not apply to a carriage performed according to 1.1.3.6, the definition of a transport unit does not allow the use of a unit comprising a dolly-axle.

6. We would like to know the opinion of the Working Group.