

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

108th session

Geneva, 10–13 November 2020

Item 5 (b) of the provisional agenda

Proposals for amendments to annexes A and B of ADR:

miscellaneous proposals

5 November 2020

**Preparation to the WP.15 meeting 108th session-OICA
comments**

**Transmitted by International Organization of Motor Vehicle
Manufacturers (OICA)**



For preparation to the WP15 108th SESSION

OICA comments

ECE/TRANS/WP.15/2020/7

(Austria)

Clarification on the rules for the transport of Battery-Electric-Vehicles and Hybrids as load,
special provision 667

BACKGROUND

- **Document WP.15/2020/7** proposes to introduce complementary information to the provision 667:
 - Sub-paragraph (ii) of special provision 667 (b) **uses vague terms** that are open to interpretation. It is not clear when:
 - “it is not possible to safely remove the cell or battery”; and
 - “it is not possible to verify the status of the cell or battery”.

As an accident covered by the media shows, these terms caused (indirectly) a lot of delay in a transport of a damaged Battery-Electric-Vehicle. These terms should be clarified.

Actions to be taken: Amend special provision 667 with an additional note for clarification.

BACKGROUND

➤ ECE/TRANS/WP.15/2020/7 proposals:

■ **Proposal 1**

NOTE: For example, it is not possible to safely remove the cell or battery, if an accident deforms the vehicle, the cell or the battery and the transport of the battery within the vehicle, as specified in (i), is safer than the removal of the cell or battery, especially if the removal would additionally require:

- a different extraction method than the method used for undamaged vehicles, like cutting through permanently installed parts; or
- a special training or protection because of the high voltage system.

■ **Proposal 2**

NOTE: For example, it is not possible to verify the status of the cell or battery, if:

- a defect of the integrated measurement system of a non-damaged vehicle prevents reading or evaluating the data of the cells or the battery, like through the On-Board-Diagnosis-System; or
- a damage to the vehicle, the battery or the cells prevents the access to internal or for external measurement systems.

OICA COMMENTS

- OICA generally **supports the Austrian proposal** to complete the information of the sub-paragraph (ii) of special provision 667 (b):
 - OICA however notes that Proposal 1 (removal of the batteries) and Proposal 2 (batteries' status) are **different subjects and approaches**.
 - Consequently, OICA recommends to **clarify the objective of the proposal**.
 - OICA recommends that the note be discussed in the **groups with the right expertise**.
 - Such shared expertise would lead to **harmonize interpretation**.