

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

111th session

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Item 5 (a) of the provisional agenda

10 March 2022

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

Engine fire suppression systems and tyre fire protection systems to reduce the likelihood of a boiling liquid expanding vapor explosion (BLEVE) or other catastrophic failure of the tank due to a fire

Transmitted by International Organization of Motor Vehicle Manufacturers (OICA)

Introduction

1. As per the chapter VII. A. 2 of the report of the 110th session of the WP.15 (November 2021 - document ECE/TRANS/WP.15/255) , WP.15 agreed that work on the chapter 9.7.9 (see Annex II of the report) should “*continue at future sessions to better define the technical provisions to be implemented*” since the Working Party noted that the length of the adopted transitional measures (see chapter 1.6. of Annex II of the report) would “*allow for further refinement of the provisions, if necessary*”.
2. OICA understands that WP.15 and the BLEVE Working Group are looking to further modify the text of chapter 9.7.9 of the ADR, as adopted per Annex II of the report.

Recommendations

3. Primarily, OICA recommends not to modify chapter 9.7.9. of the ADR, as adopted per Annex II of the report ECE/TRANS/WP.15/255.
4. Should the chapter 9.7.9. be rediscussed, OICA suggests the following as guidelines for the future discussions to improve the provisions:
 - a) OICA recommends that the technical provisions be finalized and voted latest for the ADR 2025 edition to leave time for the first stage, second stage, third stage manufacturers to implement the relevant design modifications on time.
 - b) In general, good practice at UNECE is to implement technology-neutral provisions. OICA recommends to follow this good practice since it opens the door to new, creative solutions and it avoids the regulations to freeze to a specific technology.
 - c) OICA recommends also to evaluate the approach in the context of complete or completed vehicles instead of focusing on the chassis/cab design.
 - d) Finally, OICA recommends performing a root cause analysis to well identify the technical provisions. WP.15 will then be able to set the right requirements in terms of fire propagation, for example setting a “heat flux rate” performance.
5. Specifically, OICA highlights that ADR vehicles represent a small proportion of the production. Design-restrictive requirements will automatically bring extra cost and delay for the end user.

6. OICA offered the documents INF.11/Rev.1 of the 110th WP.15 session and INF.19 of the 109th WP.15 session, that flag the constraints to design specific ADR's chassis/cab vehicles and their architectures.
