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## Economic Commission for Europe

### Inland Transport Committee

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

##### 114th session

Geneva, 6–10 November 2023

Item 5 (b) of the provisional agenda

##### Proposals for amendments to annexes A and B of ADR:

##### Miscellaneous proposals

### Combustion heater

#### Transmitted by the Government of the Russian Federation\*

##### *Summary*

<b>Executive summary:</b>	Since the definition of “combustion heater” in the list of definitions in 1.2.1 of ADR does not mention the intended use, it could be interpreted as requiring compliance with 9.2.4.7 of ADR
<b>Decision to be taken:</b>	Clarify the term “combustion heater”

\* A/77/6 (sect. 20), table 20.6.



## Introduction

1. According to 9.2.4.7.1 of annex B of ADR, combustion heaters must comply with UN Regulation No. 122. According to 6.1.2 of UN Regulation No. 122, “combustion heater” means a device directly using liquid or gaseous fuel and not using the waste heat from the vehicle’s engine – the definition is the same as that in ADR, and annex 9 to UN Regulation No. 122 repeats the content of 9.2.4.7 of annex B of ADR. However, according to 1.1 of UN Regulation No. 122, it applies to vehicles in which a heating system is fitted. Under 6.1.1. of UN Regulation No. 122, “heating system” means any type of device which is designed to increase the temperature of the interior of a vehicle, including any load area and, under 2.3. of the Regulation, “interior” means the enclosed parts of a vehicle used for the accommodation of the vehicle occupants and/or the load.
2. However, a preheater is installed on vehicles equipped with diesel engines operating in low temperatures. The preheater is used only for warming up the engine and is not intended to heat the interior of the vehicle; it is therefore not part of the passenger or load area heating system and is therefore not covered by UN Regulation No. 122.
3. Since the definition of “combustion heater” in the list of definitions in 1.2.1 of ADR does not mention the intended use, it could be interpreted as requiring compliance with 9.2.4.7 of ADR.

## Proposal submitted for a vote

### Proposal 1

4. In 1.2.1, in the definition of “combustion heater”, replace the current wording, “‘Combustion heater’ means a device directly using liquid fuel and not using the waste heat from the engine used for propulsion of the vehicle”, with: “‘Combustion heater’ means a device intended to heat the interior of a vehicle that directly uses liquid fuel and does not use the waste heat from the engine used for propulsion of the vehicle”.

### Proposal 2

5. In 1.2.1, in the definition of “combustion heater”, replace the current wording, “‘Combustion heater’ means a device directly using liquid fuel and not using the waste heat from the engine used for propulsion of the vehicle”, with: “‘Combustion heater’ means a device intended to heat and keep warm any system in the vehicle, including the engine compartment of the vehicle, that directly uses liquid fuel and does not use the waste heat from the engine used for propulsion of the vehicle”.

### Cost

None.

### Enforceability

No problems are foreseen with the implementation of the proposals.

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