Draft amendments to ECE/TRANS/WP.29/GRSG/2024/37 (OICA), as 07 Series of Amendments to UN Regulation No. 105 (Vehicles for the Carriage of Dangerous Goods)

Submitted by the experts of OICA

The text reproduced below was prepared by the experts from OICA to correct and complement the document ECE/TRANS/WP.29/GRSG/2024/37 that aims to to align the text of UN Regulation No. 105 on the latest version of the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR). The modifications to the current text of the UN Regulation are marked in bold for new or strikethrough for deleted characters; this document supersedes ECE/TRANS/WP.29/GRSG/2024/37.

**I. Proposal**

***Paragraph 5.1. (the table)*, amend to read:**

"

| *Technical specifications* | | *Vehicle designation (according to chapter 9.1 of Annex b to ADR)* | | | | |
| --- | --- | --- | --- | --- | --- | --- |
| *EX/II* | *EX/III* | *AT* | *FL* |  |
| … | … | | | | | |
| 5.1.3. | ~~Prevention of fire risks~~ **Vehicle propulsion system** |  |  |  |  |  |
| 5.1.3.2. | Fuel tanks **and cylinders** | X | X | **X** | X |  |
| 5.1.3.3. | **Internal combustion engine** | X | X | **X** | X |  |
| **5.1.3.3.1.** | Engine | X | X | **X** | X |  |
| **5.1.3.3.2.** | Exhaust system | X | X |  | X |  |
| … | … | … | … | … | … | … |
| 5.1.3.5. | Electric power train |  |  | X | **X** |  |
| **5.1.3.5.1.** | **General provisions** |  |  | **X** | **X** |  |
| **5.1.3.5.2.** | **Rechargeable electrical energy system** |  |  | **X** | **X** |  |
| **5.1.3.5.3.** | **Measures against thermal propagation** |  |  |  | **X** |  |
| **5.1.3.5.4.** | **Vehicle charging inlet** |  |  |  | **X** |  |
| **5.1.3.6.** | **Hydrogen fuel cell** |  |  | **X** | **X** |  |
| … | … | … | … | … | … | … |

"

*Paragraph 5.1.1.1.*, amend to read

“5.1.1.1. General provisions

The installation shall be so designed, constructed and protected that it cannot provoke any unintended ignition or short-circuit under normal conditions of use of vehicles.

The electrical installation~~, with the exception of the electric power train in compliance with the technical provisions of UN Regulation No. 100~~~~4~~~~, as amended at least by the 03 series of amendments,~~ shall meet the provisions of paragraphs 5.1.1.2. to 5.1.1.9. in accordance with the table of paragraph 5.1.

**The electric power train and the high voltage components which are galvanically connected to it, which are in compliance with the technical provisions of UN Regulation No. 1004, as amended at least by the 03 series of amendments, need not to comply with the provisions of paragraph 5.1.1.2 to 5.1.1.7.**”

*Paragraph 5.1.1.3.*, amend to read (addition of a new item (g)):

"5.1.1.3. Fuses and circuit breakers

All circuits shall be protected by fuses or automatic circuit breakers, except for the following:

(a) From the starter battery to the cold start system;

(b) From the starter battery to the alternator;

(c) From the alternator to the fuse or circuit breaker box;

(d) From the starter battery to the starter motor;

(e) From the starter battery to the power control housing of the endurance braking system (see paragraph 5.1.2.1.), if this system is electrical or electromagnetic;

(f) From the starter battery to the electrical lifting mechanism for lifting the bogie axle.

**(g) From the starter battery to the electric steering equipment.**

The above unprotected circuits shall be as short as possible."

*Paragraph 5.1.1.8. to 5.1.1.8.5.*, amend to read:

"5.1.1.8. ~~Battery master switch~~ **De-energizing electrical circuits**

5.1.1.8.1. ~~A switch for breaking the electrical circuits~~ **Features to enable the de-energization of the electrical circuits for all voltage levels** shall be placed as close to the battery as practicable. ~~If a single pole switch is used it shall be placed in the supply lead and not in the earth lead~~. **If the feature interrupts only one lead from the energy source, it shall interrupt the supply lead.**

5.1.1.8.2. A control device to facilitate the ~~disconnecting and the reconnecting functions of the switch~~ **de-energizing** shall be installed in the driver’s cab. It shall be readily accessible to the driver and ….

5.1.1.8.3. ~~The switch shall break the circuits within 10 seconds after activation of the control device~~ **Features to enable the de-energization of the electrical circuits shall be designed so that they can be operated when the vehicle is stationary. The de-energization shall be completed within 30 seconds after the activation of the control device.**

5.1.1.8.4. The switch shall have a casing with protection degree IP65 in accordance with IEC Standard 60529. **The feature shall be installed in such a way that IP65 protection complies with IEC 60529.**

5.1.1.8.5. **Cable connections on the feature**

~~The cable connections on the battery master switch shall have a protection degree IP54 in accordance with IEC Standard 60529. However, this does not apply if these connections are contained in a housing which may be the battery box. In this case it is sufficient to insulate the connections against short circuits, for example with a rubber cap.~~

**Systems with a voltage that exceeds 25 V AC or 60 V DC and systems under the scope of UN Regulation No. 100, shall comply with the requirements of the said regulation.**

**Systems with a voltage up to 25 V AC or 60 V DC shall have a protection degree IP 54 in accordance with IEC 60529. However, this does not apply if these connections are contained in a housing, which may be the battery box. In this case, it is sufficient to insulate the connections against short circuits, for example by a rubber cap**."

Paragraph 5.1.2.1., amend to read:

“5.1.2.1. EX/II, EX/III, AT, FL and MEMU vehicles shall fulfil all relevant requirements of Regulation No. 13, including those of Annex 5.

Vehicles equipped with an electric regenerative braking system shall fulfil all relevant technical requirements of UN Regulation No. 13, as amended at least by the 11 series of amendments, as applicable.

**Trailers with regenerative braking or electric power train are not allowed.**”

*Paragraph 5.1.3.,* amend to read:

"5.1.3. ~~Prevention of fire risks~~ **Vehicle propulsion system**

5.1.3.1.General provisions

The following technical provisions shall apply in accordance with the table of paragraph 5.1.

**Hybrid vehicles equipped with an internal combustion engine and electric power train shall comply with the relevant provisions of 5.1.3.2. to 5.1.3.5."**

*Paragraph 5.1.3.2.,* amend to read (delete the note, re-number the subparagraphs from (a) to (f)):

"5.1.3.2. Fuel tanks and cylinders

~~NOTE: 5.1.3.2 likewise applies to fuel tanks and cylinders used for hybrid vehicles which include an electric power train in the mechanical driveline of the internal combustion engine or use an internal combustion engine to drive a generator to energize the electric power train.~~

The fuel tanks and cylinders supplying the engine of the vehicle shall meet the following requirements:

(a) In the event of any leakage under normal conditions of carriage, the liquid fuel or the liquid phase of a gaseous fuel, shall drain to the ground and not come into contact with the load or hot parts of the vehicle;

(b) Fuel tanks for liquid fuels shall meet the requirements of UNRegulation No. 34; fuel tanks containing petrol shall be equipped with an effective flame trap at the filler opening or with a closure enabling the opening to be kept hermetically sealed.

**(c)** Fuel tanks and cylinders for LNG and for CNG respectively shall meet the relevant requirements of UN Regulation No. 110.

**(d)** Fuel tanks for LPG shall meet the relevant requirements of UN Regulation No. 67;

**(e)** Fuel tanks and cylinders for hydrogen shall meet the relevant requirements of UN Regulation No. 134, at least series 02 of amendments or for liquid hydrogen containers the technical provisions of Global Technical Regulation No.13, Amendment 1, part 7.

~~(c)~~ **(f)** The discharge opening(s) of pressure relief devices and/or pressure relief valves of fuel tanks containing gaseous fuels shall be directed away from air intakes, fuel tanks, the load or hot parts of the vehicle and shall not impinge on enclosed areas, other vehicles, exterior-mounted systems with air intake (i.e. air conditioning systems), engine intakes, **electrical storage systems** or engine exhaust. Pipes of the fuel system shall not be fixed on the shell containing the load.”

*Paragraph 5.1.3.3.*, amend to read:

**"**5.1.3.3. ~~Engine~~ **Internal combustion engine**

~~NOTE: 5.1.3.3. likewise applies to hybrid vehicles which include an electric power train in the mechanical driveline of the internal combustion engine or use an internal combustion engine to drive a generator to energize the electric power train.~~

**5.1.3.3.1.** Engine

The engine propelling the vehicle shall be so equipped and situated to avoid any danger to the load through heating or ignition. ~~The use of CNG or LNG as fuel shall be permitted only if the specific components for CNG and LNG are approved according to UN Regulation No. 110 and meet the provisions of paragraph 5.1.1. The installation on the vehicle shall meet the technical requirements of paragraph 5.1.1. and UN Regulation No. 110. The use of LPG as fuel shall be permitted only if the specific components for LPG are approved according to UN Regulation No. 67 and meet the provisions of paragraph 5.1.1.~~

~~The installation on the vehicle shall meet the technical requirements of paragraph 5.1.1. and UN Regulation No. 67. In the case of EX/II, and EX/III and MEMU vehicles, the engine shall be of compression-ignition construction using only liquid fuels with a flashpoint above 55 °C. Gases shall not be used.~~

**The use of a fuel shall only be permitted if components are approved and installation meet the provisions of Para 5.1.1. and the technical requirements of:**

**(a) UN Regulation No. 110 for CNG or LNG.**

**(b) UN Regulation No. 67 for LPG.**

**(c) UN Regulation No. 134 for compressed hydrogen and the technical provisions of Global Technical Regulation No.13, Amendment 1 for liquid hydrogen, as relevant.**

**In the case of EX/II and EX/III vehicles the engine shall be of compression-ignition construction using only liquid fuels with a flashpoint above 55 °C. Gases shall not be used.**

*Paragraph 5.1.3.4.*, renumber as paragraph 5.1.3.3.2.

*Insert a new paragraph 5.1.3.4.*, to read:

"5.1.3.4. **Reserved**"

*Paragraph 5.1.3.5.*, amend to read:

"5.1.3.5. Electric power train

~~NOTE: 5.1.3.5. likewise applies to hybrid vehicles that include an electric power train in the mechanical driveline of an internal combustion engine. Electric power trains shall not be used for EX and FL vehicles.~~

**Electric power trains shall not be used for EX vehicles.** **Trailers with re-generative braking or electric power train are not allowed."**

**5.1.3.5.1. General provisions**

The electric power train shall meet the requirements of UN Regulation No. 100, as amended at least by the 03 series of amendments. ~~Measures shall be taken to prevent any danger to the load by heating or ignition.~~

**Vehicles with an electric power train shall be equipped with an isolation resistance monitoring system.**

**The vehicle shall give external signals in stationary conditions, in addition to the warning to the driver received in the driver’s cab as required by paragraph 6.15.1. of UN Regulation No.100 [[1]](#footnote-2)8, as amended at least by the 03 series of amendments.**

**5.1.3.5.2. Rechargeable Electrical Energy Storage System (REESS)**

***Note:* Other acronyms for REESS are used in other documentation for similar systems (e.g. RESS).**

**REESS of vehicles with an electric power train shall be designed and constructed taking into account a risk evaluation according to ISO 6469-1:2019/Amd 1:2022 to establish safety for normal operational conditions.**

**A review shall be carried out by a technical service such as a technical service for vehicle approvals according to UN Regulation No. 100.**

***Note:* Normal operating conditions also include malfunctions and reasonably foreseeable accidental situations*.***

**5.1.3.5.3. Measures against thermal propagation**

**REESS containing cells for which thermal propagation cannot be guaranteed to be contained within the REESS, measures shall be taken to mitigate danger to the load by heating or ignition.**

**5.1.3.5.4. Vehicle charging inlet**

**The vehicle charging inlet shall be provided with thermal sensing function which limits or interrupts current transfer according to ISO 17409:2020, when the temperature exceeds component rated values or required limits by applicable product standards, see for example, IEC 62196-3-1:2020.9.2.5."**

*Insert new paragraphs 5.1.3.7. to 5.1.3.7.3.*, to read (including the references to new footnotes 9 and 10):

**"5.1.3.7. Hydrogen and fuel cell vehicles**

**5.1.3.7.1. Hydrogen fuel cell vehicles shall comply with the requirements for the electrical power train of paragraph 5.1.3.5.**

**5.1.3.7.2. Hydrogen fuel cell vehicles shall comply with UN Regulation No. 134[[2]](#footnote-3)9, as amended at least by the 02 series of amendments. Vehicles using liquid hydrogen shall be subject to the technical requirements of the [Global Technical Regulation No.13[[3]](#footnote-4)10, Phase 2].**

**5.1.3.7.3. Shut-off devices of hydrogen containers shall close automatically:**

**(a) when the vehicle is no longer in driving mode;**

**(b) at a deceleration of [3.25 m·s-2 for 0.7 s]; and**

**(c) in case of a lateral overturning above an angle of 23°.**

**The shut-off devices may be re-opened by a deliberate action of the driver."**

*Insert new paragraphs 10.5 to 10.6.5*., to read:

**"10.5. General transitional provisions**

**10.5.1. Contracting Parties applying this Regulation may grant type approvals according to any preceding series of amendments to this Regulation.**

**10.5.2. Contracting Parties applying this Regulation shall continue to grant extensions of existing approvals to any preceding series of amendments to this Regulation**

**10.6. Transitional provisions for the 07 series of amendments**

**10.6.1. As from the official date of entry into force of the 07 series of amendments, no Contracting Party applying this Regulation shall refuse to grant or refuse to accept type approvals under this Regulation as amended by the 07 series of amendments.**

**10.6.2. Transitional provisions for AT vehicles**

**10.6.2.1. Until 1 January 2027, Contracting Parties applying this Regulation shall accept type approvals to the preceding series of amendments, first issued before 1 January 2027.**

**10.6.2.2. As from 1 January 2027, Contracting Parties applying this Regulation shall not be obliged to accept type approvals** **issued to the preceding series of amendments to this Regulation.**"

**II. Justification**

1. This document aims to align UN Regulation No.105 with ADR, the 2025 edition.
2. It contains the amendments agreed on by the Working Party on the Transport of Dangerous Goods (WP.15) at their November 2023 and March 2024 sessions.
3. The table of paragraph 5.1. is amended to reflect the new structure adopted for ADR 2025. In particular, references to the provisions for Electric Vehicles (EVs) and hydrogen fuel cell vehicles are introduced.
4. Paragraph 5.1.1.3. introduces a new exemption for the electric steering equipment, as per the ADR 2025. Electric steering equipment will become the standard steering system in the near future to accompany the new fuel economy requirements and the introduction of EVs. The electric steering systems may reach such high temporary current intensities as those of the other exemptions listed in paragraph 5.1.1.3.: the situation for the electric steering systems is similar to that of, for example, the electric axle lifting system. Fuses for these systems would have to be so large that they would only have a symbolic value.
5. Paragraph 5.1.1.8. is amended to reflect the new wording adopted at WP.15 to address the so-called "battery master switch" now identified as "features to enable the de-energization of the electrical circuits". The new provisions are adapted to EVs.
6. Paragraph 5.1.2.1. clarifies the level of performances for the braking systems. ADR2025 prohibits the use of trailers with regenerative braking system and electric powertrain. GRSG may decide to remove this provision since it is an in-use condition rather than a design requirement.
7. Paragraph 5.1.3. is re-structured and is amended to reflect the new powertrains that are progressively introduced by the manufacturers (EVs, hybrid vehicles, fuel cell vehicles, etc.). The provision requesting “a review [to] be carried out by a technical service such as a technical service for vehicle approvals” may not well fit a construction regulation as UN R105.
8. The proposed transitional provisions are introduced to assist the manufacturers to adapt their (future and current) production and to apply for approval to UN Regulation No. 105 in time to comply with the new provisions of ADR 2025.
   1. The transitional provisions are re-structure to distinguish the “permanent” provisions (paragraphs 10.5.1. and 10.5.2.) that are independent from the series of amendments, from the “variable” provisions that vary according to the version of the regulation. It is expected that the successive series of amendments will be added with successive paragraphs numbering.
   2. Paragraph 10.6.1 is the regular text for the entry into force of the new series of amendments
   3. Paragraph 10.6.2. defines the dates for New Types of AT vehicles. The ADR2025 introduces new requirements for FL vehicles, which are hence “ignored” by the current version of UN R105, so as the FL vehicles do not need transitional provisions, though AT vehicles do. The dates proposed (1 January 2027) are aligned on those adopted at WP.15 for ADR2025.
9. This proposal does not deviate from the provisions contained in the ADR 2025; there is no other amendments than those introduced by ADR 2025.

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1. 8 UN Regulation No. 100 (Uniform provisions concerning the approval of vehicles with regard to specific requirements for the electric power train) [↑](#footnote-ref-2)
2. **9 UN Regulation No. 134 (Uniform Provisions concerning the Approval of Motor Vehicles and their Components with regard to the Safety-Related Performance of Hydrogen-Fuelled Vehicles (HFCV)).** [↑](#footnote-ref-3)
3. **10 UN Global Technical Regulation No. 13 on hydrogen and fuel cell vehicles.** [↑](#footnote-ref-4)