

**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

**Working Party on the Transport of Dangerous Goods**  
**(71<sup>st</sup> Session, Geneva, 5-9 November 2001)**

**PROPOSAL FOR THE REVISION OF BATTERY MASTER SWITCH  
REQUIREMENTS**

*Information Paper from the Government of the United Kingdom*

**Summary**

This proposal concerns the revision of section 9.2.2.3.2 - Battery Master Switch - to delete the requirement for a reconnect facility in the cab, and to revert to that part of the former text of 220.512(2) which required a second control (to disconnect) on the outside of the vehicle.

**Action**

The UK Government proposes a revision of 9.2.2.3.2 to be in accordance with previous safe practice of 220.512(2).

**Proposal**

WP15 is requested to accept the following text changes to 9.2.2.3.2

9.2.2.3.2 ~~A control device to facilitate the disconnect/reconnect functions shall be installed in the driver's cab. Direct or indirect controls shall be installed, one in the driver's cab and a second on the outside of the vehicle. They shall be readily accessible and to the driver and be distinctively marked. That in the cab shall be within immediate reach of the driver seated in the driver's seat and it shall be protected against inadvertent operation by either adding a protective cover, by using a dual movement control device or by other suitable means. Additional control devices may be installed provided they are distinctively marked and protected against inadvertent operation.~~

An indication shall be provided at the point of isolation (i.e. where the contacts are opened) that the contacts have opened; additional indication may be provided.

**Justification**

The original text of ADR is preferred on safety grounds.

In the event of an accident in which the driver is incapacitated or otherwise omits to operate the in-cab control of the battery master switch, or even where the cab is

damaged to the extent that it is not possible to identify and locate the control, an external control provides immediate access for the emergency services to operate the switch.

The justification on safety grounds for a reconnect facility within the cab cannot be identified and should be deleted; it adds unnecessary complexity and cost as the reconnect facility will, in practice, have to be permanently powered and therefore be in accordance with 9.2.2.5 *Permanently energised circuits*.

It is recommended that a requirement concerning the indication of the position (open / closed) of the battery master switch contacts is added in order to prevent potential conflict between the position of the control in the cab and the position of the contacts of the switch:

### **Safety**

The deletion of the requirement for a reconnect facility of the battery master switch in the cab has no effect whatsoever on safety.

The addition of a requirement to have a positive indication of the position of the battery master switch is good practice and improves the safety of the system particularly where remote operation devices are fitted which have a consequential risk of malfunction.

### **Feasibility**

No technical or other legal problems are foreseen.

### **Enforceability**

No additional enforcement issues are foreseen.

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