Proposal for amendments to Regulation No. 122 (Heating systems)

A. PROPOSAL:

Add a new chapter 3 with the following content to Annex 8:

"3 LPG HEATING SYSTEMS FOR ROAD USE IN TRAILERS

- 3.1. If an LPG heating system in a trailer can also be used when the vehicle is in motion, the LPG combustion heater and its supply system shall comply with the following requirements:
- 3.1.1. The LPG combustion heater shall comply with the requirements of the harmonized standard EN 624:2000 (Specifications for dedicated LPG appliances Room sealed LPG space heating equipment for installation in vehicles and boats).
- 3.1.2. The gaseous phase installation of the LPG heating system in a vehicle shall comply with the requirements of the harmonized standard EN 1949:2002. 1/ (Specifications for the installation of LPG systems for habitation purposes in leisure accommodation vehicles and in other road vehicles)."

B. JUSTIFICATION:

There has been uncertainties of some type approval bodies regarding the possibility to type approve a trailer (mostly caravans) with a heating system for heating while the vehicle is in motion.

It was supposed when writing the Directive that since there are no passengers in a caravan while driving there is also no heating requirement. This was not a correct assumption because there is a need for heating the caravan in for instance colder countries to avoid freezing of liquids (water, waste water) and to ensure a warm home when reaching the final destination after a long drive. Also for truck-trailer carrying goods which have to be kept at a special temperature (e.g. flowers) there is a strong need for heating while in motion.

The provisions regarding a supplement safety element for heating according to 1.1.6.2 for motor vehicles was added to prevent passengers from risk of fire caused by an accident.

For trailers there is no need for this since there are no passengers inside while driving.

Nevertheless there should be a possibility to type approve also a trailer (caravan or trailer for temperature sensitive goods) for a heating system for heating while in motion.

The new chapter 3 shall give the possibility to type approve trailers with heating system for heating while in motion.

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