Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

107th session Geneva, 11-15 November 2019 Item 6 of the provisional agenda Interpretation of ADR 4 November 2019

Truck on flat-bed trailer

Transmitted by the Government of Belgium

Introduction

During a road check in Belgium our inspectors encountered following situation (see picture below).

Explanation

We have doubts concerning the yellow truck on the flat-bed trailer.

At the moment of inspection, the truck did not have a certificate of annual technical inspection (not authorised for use on public roads), nor was the ADR tank tested by a notified body.

The tank-vehicle was approved for ADR transport until 2008.

Now it appears it is only used for transport of UN1202 on private construction sites.

Once the construction is completed, the truck needs to be transported to the next site.

This transport is done by placing this truck on a flat-bed trailer. The truck, being transported, is empty, uncleaned.

Discussion

The opinion of several ADR experts was asked and there was no consensus reached. Hereby we want to hear the view of the Working Party.

- 1. Is this transport submitted to ADR or not?
- 2. If this transport is submitted to ADR, shall this transport be carried out using an exemption?

If so, which exemption shall be used: for example, 1.1.3.1.c or 1.1.3.1 f or ...?

3. If this transport is fully submitted to ADR, what shall be the signalisation of this truck and/or the flat-bed trailer?

