

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

15 March 2023

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Bern, 20-24 March 2023

Item 5 (b) of the provisional agenda:

Proposals for amendments to RID/ADR/ADN:

New proposals

Comments on informal document INF.4/Rev.1 concerning the definition of “battery vehicle”

Transmitted by the European Industrial Gases Association

Introduction

1. In informal document INF.4/Rev.1 the United Kingdom proposes to change the definition of “battery-vehicle” and “battery-wagon” to align the definitions with the International Maritime Dangerous Goods (IMDG) Code.
2. The term “road gas elements vehicle” in IMDG was a compromise due to confusion of the terms “battery-vehicle” with “battery electric vehicle” and the fact that the term “battery-vehicle” was unknown to IMDG experts not familiar with ADR.
3. EIGA believes that this confusion does not exist in ADR since the term “battery-vehicle” is well established since decades and well known in ADR contracting parties.

Proposals and justification

4. **Proposal 1:** EIGA prefers not to change the definitions as proposed by the United Kingdom.
5. Justification: There is no safety implication. The term “battery-vehicle” has not caused any confusion in the past and changing the term would cause unnecessary administrative efforts in ADR and other publications, for example in EN 13807 where the term “battery-vehicle” is mentioned.
6. Furthermore, UN 3171 BATTERY-POWERED VEHICLE has been well established in ADR and has not caused any confusion with the term “battery-vehicle”.
7. It is to be considered that in ADR battery-vehicles for flammable gases are designed with individual groups of receptacles with a capacity of up to 5 000 litres (ADR 6.8.3.2.28). In IMDG Code the limit of the capacity of groups is only 3 000 litres for flammable gases (IMDG 6.7.5.3.2). Therefore, battery-vehicles and road gas elements vehicles are different in design. EIGA is concerned that changing the definition can result in that the size of said groups would be reduced in ADR.
8. **Proposal 2:** Should the Joint Meeting conclude that there is enough cause for confusion, EIGA proposes to change “battery-vehicle” and “battery-wagon” to the terms “multiple-element gas vehicle” and “multiple-element gas wagon” instead of “Road gas elements vehicle” and “Rail gas elements wagon”.
9. Justification: This would align the terminology with multiple-element gas containers (MEGCs).
10. Furthermore, EIGA has been informed that “Road gas elements vehicle” is not easily translated in other languages.

11. Ideally, in IMDG Code the terminology should also be changed to “multiple-element gas vehicle” and the capacity of above-mentioned groups should be increased to the value given in ADR.

Safety implications

12. None foreseen.
