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INLAND TRANSPORT COMMITTEE

**Working Party on the Transport  
of Dangerous Goods**

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**PART 9 OF ADR**

**9.3.4 EX/III VEHICLES**

**Transmitted by the Government of Norway**

**SUMMARY**

Executive Summary:	The use of the word “continuous” in connection with the loading surface and front wall has led to interpretations that have created problems with the construction/approval of EX/III vehicles.
Action to be taken:	Change the text in 9.3.4.
Related documents:	None

**Introduction**

The second sentence of 9.3.4 says: “The loading surface, including the front wall, shall be continuous”. This has led to the interpretation that there can be no cargo securing elements inserted into the floorboards or the walls of such vehicles.

The technical background for the present wording is not clear in this day and age, but it is supposed that it may stem from a fear that spills from the cargo of explosive substances may be trapped in joints and installations in the floor. With the requirements for packagings and the packing instructions that have been in force for some time now, such spills during transport should not occur. And if it does, something needs to be done to the packaging requirements and the packing provisions, not putting extra requirements on the vehicles.

Proposal

In the second sentence of 9.3.4, change the word “continuous” to read “without openings”.

Justification

This change will allow for the installations of cargo securing elements and other necessary installations without lowering the safety in transport of explosives. On the contrary, it will give greater possibilities for installing equipment that will assure securing of the load in a better and more easily accomplished way.

Safety implications

As mentioned above, this will make it possible to install cargo securing equipment that will be easy to use and thus improve safety. The criteria for fire resistance will assure that no dangerous heat transfer through the floorboards and walls due to the installations of such equipment will occur.

Feasibility

No problems in practice are to be envisaged by this change. It will take away an obstacle for the approval of EX/III vehicles.

Enforceability

The change will remove a possibility of misinterpretations in the process of approving EX/III vehicles.

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