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Working Party on the Transport of Dangerous Goods

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Item 5 of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Tunnel restriction codes for some articles of Class 2

Transmitted by the European Aerosol Federation (FEA)

SUMMARY

Executive Summary:	For some articles of Class 2 (e.g. UN 1950 AEROSOLS) the tunnel restriction code is “B1D” (for classification codes F, TF, TFC) or “C1D” (for T, TC, TO, TOC). The articles are not allowed to be transported in bulk or tanks. The decision at the 82nd session to include the tunnel restriction code into the dangerous goods sequence of the document may lead to misinterpretations. It is proposed to change the above mentioned tunnel restrictions codes for articles of Class 2 to “D”.
Action to be taken:	Change tunnel restriction codes “(B1D)” and “(C1D)” for UN 1057, UN 1950, UN 2037 and UN 3150 in column (15) of Table A in chapter 3.2 to “(D)”.
Related documents:	ECE/TRANS/WP.15/192, para. 38 ECE/TRANS/WP.15/192/Add1, pages 7-8 ECE/TRANS/WP.15/2007/7 (France) and INF.4 (Sweden) ECE/TRANS/WP.15/191, para. 38-39 INF.12 (Poland) of the 81 st session.

Introduction

1. In ADR 2007, tunnel restrictions codes were implemented in column (15) of Table A in chapter 3.2.
2. For Class 2, the tunnel restriction code was based on the classification code of the entries in Table A (see informal document INF.12 (Poland)) submitted at the 81st session.
3. This leads to a situation where some articles of Class 2, which are only allowed to be transported in packagings, have a tunnel restriction code “B1D” or “C1D”.
4. During the 82nd session, the Working Party decided, based on the documents ECE/TRANS/WP.15/2007/7 (France) and INF.4 (Sweden), that the tunnel restriction code had to be mentioned in the dangerous goods sequence in the transport document. It need not be added in the transport document, where it is known beforehand that the itinerary does not include passage through a tunnel with restrictions for carriage of dangerous goods.
5. In FEA’s view the tunnel restrictions codes for UN 1950 AEROSOLS mentioned in para. 3 of this document should be changed to “D”, because these articles are not allowed to be transported in tanks.
6. As already proposed in INF.12 (Poland), the Working Party may decide to make the same change also for the following UN-Numbers: UN 1057, UN 2037 and UN 3150.

Proposal

7. Change the existing tunnel restriction codes “B1D” and “C1D” to “D” for the following UN Numbers: [UN 1057], UN 1950, [UN 2037] and [UN 3150].

Justification

8. Avoidance of misinterpretations.

Safety implications

9. None.

Feasibility

10. Editorial change to improve the clarity and user-friendliness of the regulations.

Enforceability

11. No problem.
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