
ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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Agenda item 9

ANY OTHER BUSINESS

Relation between the transitional period for implementation of section 1.9.5 and the new requirement in 5.4.1.1.1 (k) to add the tunnel restriction code in the transport document

Transmitted by the Government of Sweden

Introduction

In Sweden, new regulations must be circulated for comments among those concerned before publication. This procedure has been undertaken for the new edition of ADR and certain questions have arisen. One of the questions concerns sub-section 5.4.1.1.1 (k) which requires that the tunnel restriction code be added in the transport document.

Since there are no transitional periods related to 5.4.1.1.1 (k), a question has arisen as to whether or not there is a contradiction in the new tunnel regulations. From 1 July 2009, the restriction code for tunnels has to be added in the transport document, even if the country in question has not yet implemented the new tunnel regulations.

Though we agree with the understanding of the text that has prompted this question, we are not convinced that the lack of a transitional period for 5.4.1.1.1 (k) would cause any serious problems. However, it would be unfortunate if a carrier was penalized by the enforcement body for such a minor offence during this period.

Sweden would like to hear other countries' views on this matter.
