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Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 5 (b) of the provisional agenda

Proposals for amendments to Annexes A and B of ADR: miscellaneous proposals

Safety in road tunnels

Transmitted by the International Association for Soaps, Detergents and Maintenance Products (AISE)¹

Summary

Executive summary: The decision taken during the ninetieth session with respect to tunnel restrictions for loads exceeding 8 tonnes of dangerous goods packed in limited quantities in accordance with Chapter 3.4 did not take into account the current situation in intermodal transports. AISE suggests to re-discuss the issue.

Action to be taken: Deletion of the new requirement in chapter 8.6.3 and 8.6.4.

Related documents: ECE/TRANS/WP.15/210
ECE/TRANS/WP.1/2011/2
Informal documents INF.5, INF.11 and INF.19 (ninetieth session)

¹ The present document is submitted in accordance with paragraph 1 (c) of the terms of reference of the Working Party, as contained in document ECE/TRANS/WP.15/190/Add.1, which provides a mandate to “develop and update the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)”.

Introduction

1. During the ninetieth session of the Working Party a discussion was held on the question of introducing tunnel restrictions for transport units carrying in excess of 8 tonnes of dangerous goods packed in limited quantities in accordance with Chapter 3.4. The discussion is reflected in paragraphs 46 to 50 of the report (ECE/TRANS/WP.15/210).
2. The discussion did not reflect and did also not take into account that the new regulation concerning the marking of both packages and transport units, was a result of a huge effort to achieve as much intermodal harmonization as possible.
3. A long transitional period until 30 June 2015 was agreed and adopted for ADR 2011 in 1.6.1.20. With the thirty-fifth Amendment of the International Maritime Dangerous Goods Code the new marking requirements will come into force on 1 January 2012. The different time frames are needed, as goods transported by sea might reach ADR territory until the end of year 2011 in packagings bearing the “old” markings. These packagings have to be distributed through a multi-level distribution chain.
4. In addition to that the size limits of the inner packagings have been completely harmonized between the sea and the land mode. This might lead to a complete change of the whole packing systems, which will be done during the transitional period.
5. Transport units coming from a sea journey (from overseas or after a ferry crossing in Europe) will have the new marking for limited quantities and they would also be covered by the new tunnel restriction in practice.
6. AISE invites the Working Party to re-consider the situation and not to change the ADR 2011 with respect to chapter 3.4 and 8.6. We have the strong feeling that significant changes during the transitional period should be avoided.

Proposal

7. The working Party is requested not to change ADR 2011 with respect to tunnel restrictions for goods following the limited quantity regime of chapter 3.4.
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