

Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****26 April 2011****Ninetieth session**

Geneva, 3–5 May 2011

Item 6 (b) of the provisional agenda

Proposals for amendments to annexes A and B of ADR:**Miscellaneous proposals****Discussion paper on working document
(ECE/TRANS/WP.15/2011/2) on safety in road tunnels****Transmitted by the Government of the Netherlands**

1. Document ECE/TRANS/WP.15/2011/2 transmitted by the Government of Switzerland intends to subject the carriage of loads exceeding 8 tonnes of dangerous goods packed in limited quantities (in accordance with Chapter 3.4) to tunnel traffic restrictions.
 2. We appreciate the effort Switzerland has put into this but we would not like to reopen the discussion on the issue because we are of the opinion that it had been agreed in principle that dangerous goods packed in limited quantities in accordance with Chapter 3.4 would not be subject to tunnel restrictions.
 3. The implementation of the tunnel restrictions has had and still has a severe impact on our transport sector and system. Imposing transport restrictions will make it more difficult and costly for this kind of distribution transport to reach its destinations. Furthermore it is difficult to explain why we should have these extra restrictions so soon after implementing the regulation on tunnel restrictions. What is the safety benefit of these restricting measures compared to the difficulties that would arise for the transport system and the extra costs/administrative burden.
 4. The tunnel restrictions are meant to protect against the most serious dangers. For us it is difficult to understand how to link these serious dangers like very large explosions and fires to transport in limited quantities.
 5. We are therefore not in favor of the proposal of Switzerland.
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