
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Geneva, 9 – 13 November 2015

Item 6(b) of the provisional agenda

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

6 November 2015

Simplification and alignment of Tunnel category E text and 1.9.5.2.2 of ADR Comments on document ECE/TRANS/WP.15/2015/12

Transmitted by the Government of Switzerland

The following questions have raised by the proposals from the United Kingdom in document ECE/TRANS/WP.15/2015/12

Our understanding of the text in point 6. of the proposal is that the condition to be subject to the tunnel restriction for “all dangerous goods other than those for which ‘(-)’ is marked in column (15) of Table A” is that only transport units marked in accordance with 3.4.13 subject to 3.4.14 are subject to restriction in tunnels. It seems obvious that this is not right.

1.9.5.2 refers only to the question of categorization of the dangerous goods in relation with the tunnel categories. The question of marking and subjection to the tunnel restrictions is already solved in 1.9.5.3 (res. 1.9.5.3.6) and does not need to be solved in 1.9.5.2.2.

Even if it could be felt that the texts are complicated to understand, those are destined to be read mostly by competent authorities or tunnel operators. So we don't believe there is a real need to better describe the categorization rules.

On the contrary Chapter 8.6 is destined to the drivers. The proposed improvement only repeats what is already said in the first indent in 8.6.4. The NOTE should be a clarification for the driver. Even if it seems a simplification for the rule-maker the proposed text does not say anything new and the driver will not understand better when he is supposed to do what. He only wants to know when he is subject to a marking of his vehicle. The NOTE 2 explains in other words the content of 8.6.4 and says to the driver when the transport unit is not subject to the marking.
