



**Economic and Social
Council**

Distr.
GENERAL

ECE/TRANS/WP.15/2007/18
10 August 2007

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Eighty-third session
Geneva, 5-9 November 2007
Item 5 of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Tunnel restriction codes in dangerous goods sequence (5.4.1.1.1 k))

Transmitted by the International Association of the Soap, Detergent and
Maintenance Products Industry (AISE)

SUMMARY

Executive Summary:	The decision in the 82 nd session to include the tunnel restriction code into the dangerous goods sequence just behind the Packing Group could lead to problems, using the documentation of the air or sea modes in accordance with 1.1.4.2.3. It is proposed to get more flexibility by amending 1.1.4.2.3.
Action to be taken:	Amend existing 1.1.4.2.3. by deleting “or entered at the appropriate place”
Related documents:	ECE/TRANS/WP.15/192, para. 38 ECE/TRANS/WP.15/192/Add.1, pages 7-8 ECE/TRANS/WP.15/2007/7 (France) and INF.4 (Sweden)

Introduction

1. In ADR 2007, tunnel restrictions codes were implemented in column (15) of Table A in chapter 3.2.
2. During the 82nd session the Working Party decided, based on the documents ECE/TRANS/WP.15/2007/7 (France) and informal document INF.4 (Sweden), that the tunnel restriction code had to be mentioned in the dangerous goods sequence in the transport document at a specific location: after the Packing Group. 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.
3. This strict requirement on the location of the tunnel restriction code will lead to problems, if for multimodal transport, the document in accordance with the IMDG-Code or the ICAO-TI is used.
4. It will often not be possible to add the tunnel restriction code at its required place after the Packing Group, if the option of 1.1.4.2.3 is used. This means that a complete new ADR document would have to be issued.
5. AISE is of the opinion that there should be some flexibility on where the additional information required by ADR should be added.

Proposal

6. Delete “or entered at the appropriate place” at the end of 1.1.4.2.3.

Justification

7. The decision would lead to more flexibility where additional information required by ADR is placed in a document issued in accordance with the IMDG-Code or the ICAO-TI for multimodal shipments.

Safety implications

8. None. The required additional information would still have to be added on the document related to the other mode (air or sea).

Feasibility

9. Editorial change to improve the user-friendliness of the regulations.

Enforceability

10. No problem.
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