Executive summary: This proposal is intended to satisfy the request of the Inland Transport Committee for a study of the recommendations and identification of those which could be incorporated into ADR.

Action to be taken: Insertion of a footnote for “tunnels” in 1.9.3 (a) and addition of a new (d) in 8.2.2.3.2 (subjects of the basic course for drivers), and consequent renumbering of the following paragraphs.

Related documents: - TRANS/AC.7/9 and TRANS/AC.7/9/Add.1
- TRANS/WP.15/170, para. 66.

Introduction

The Inland Transport Committee’s report on safety in road tunnels (TRANS/AC.7/9 and TRANS/AC.7/9/Add.1) contains 43 recommendations (plus two in Addendum 1), with reference to the four factors which affect safety in tunnels: road users, operation, infrastructure and vehicles.
Of the 10 recommendations referring to road users (plus two in Addendum 1), two relate to the work of WP.15 - recommendation 1.06 (driver training) and recommendation 1.07 (rationalization at the international level of regulations governing the transport of dangerous goods).

Proposal relating to recommendation 1.06

Addition of a new (d) to 8.2.2.3.2 (subjects of the basic course for drivers) and consequent renumbering of the following paragraphs:

“(d) instructions on behaviour in tunnels (prevention and safety, action in the event of fire or other emergencies, etc.)”;

Justification:

Incorporation of the Inland Transport Committee’s recommendation into ADR.

Proposal relating to recommendation 1.07

Insert in 1.9.3 (a) (Transport restrictions by the competent authorities) a footnote for “tunnels” to read:

“*Note: Traffic regulations may call for a quantitative risk analysis, envisage operational measures (such as a declaration before entering, an escort, the formation of convoys, an increase in the safety distance between these vehicles, allocation of a timetable for certain vehicles), improve management of dangerous goods traffic, e.g. with automatic detection systems, etc.”.

Justification:

When the limits of use of an infrastructure are defined, a study should be made of the risks which may occur in the event of an accident. An accident in a tunnel in particular is more dangerous than an accident in the open.

It is for this reason that it is proposed to include this footnote in which a number of operational measures can be envisaged and regulated by the competent authorities. Quantitative risk analysis will probably become mandatory for all European Union tunnels.

Traffic and route regulations come within the scope of the operations experts of the competent authorities. The local operator has in-depth knowledge of the environment, the habits and customs of the towns and industries surrounding the tunnel, possible courses of action in an emergency, etc. WP.15 probably does not have expertise in the operation of infrastructures, and ADR is not the best agreement for including regulations on traffic in tunnels.
We consider that the proposal to create five dangerous goods cargo groupings, to be used to regulate the authorization of the transport of dangerous goods in road tunnels, is not appropriate for the following reasons:

− A new classification does not contribute anything new and may on the contrary lead to confusion;

− Bridges and tunnels are special constructions, which adapt the route to the specific circumstances of the environment.

An international standard would rationalize the traffic of some goods (it should be noted that the transport of dangerous goods by road is extraordinarily safe\(^1\)), since not all tunnels can take into account the special features predominating during their construction which also affect other routes. All of this may lead to a deterioration in overall safety.

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\(^1\) Spain and other countries have similar data; a vehicle carrying dangerous goods is involved in only 0.2% of accidents, 0.5% of accident victims are involved in an accident with a vehicle carrying dangerous goods, while the carriage of these goods accounts for 10% of road transport in tonnes.

If the number of victims caused by the dangerous goods carried is considered, it will be seen that they account for only 5% of victims of accidents in which a vehicle carrying dangerous goods is involved.