

INLAND TRANSPORT COMMITTEE

Working Party on the Transport  
of Dangerous Goods

(Seventy-sixth session, Geneva,  
3-7 May 2004,  
agenda item 6)

SAFETY IN ROAD TUNNELS

Transmitted by the government of the United Kingdom

Comment on TRANS/WP.15/2004/17 (Note by the Secretariat) and TRANS/WP.15/2004/24  
(Report of the Feldkirch Working Group)

1. The United Kingdom thanks the Secretariat and the government of Germany for its work in producing papers 2004/17 and 2004/24 respectively, and fully supports the thrust of the two papers.
2. The work undertaken at the Feldkirch working group, as reported in 2004/24, was an important step in agreeing a standardised and workable approach to the transport of dangerous goods through road tunnels. The working group, well attended by many ADR contracting parties and industry groups, was mandated to carry out analysis of the OECD/PIARC report and to bring forward agreed proposals for the inclusion of criteria for categorising road tunnels for WP15's consideration. In the view of the United Kingdom, the mandate for inclusion of tunnel provisions into ADR was clear and the overwhelming majority of the participants supported the conclusions of the Working Group. These proposals should now be considered for adoption into ADR 2007, without the need for opening up the fundamental principles agreed at the Feldkirch Working Group. In particular to allow a competent authority to deviate from the tunnel categorisation system, as one contracting party has proposed, would completely nullify the benefits of the system.
3. The Secretariat's note (2004/17) seeks to translate the agreed proposals from the Feldkirch working group into a legal text for adoption into ADR. The United Kingdom supports this aim and the Secretariat's proposals. In so doing, the Secretariat has proposed to reverse the order of tunnel categorisation from that set out by OECD/PIARC and utilised by the Feldkirch Working Group. This was a matter considered at Feldkirch but not adopted. Whilst the concept of grouping is a fundamental principle the reordering of the groupings is not and the United Kingdom can see the merit of the Secretariat's approach. However, to judge by a number of the comments submitted by others on this topic, it appears that the reordering of the groupings has created some confusion.
4. The Secretariat propose that, as it is self evident from existing road tunnel signing that a number of tunnels permit the passage of no dangerous goods and that the absence of any signing at a road tunnel would indicate that all dangerous goods are permitted through a particular tunnel, there is no need to include those grouping (E and A in the OECD/PIARC system or A and E in the Secretariat system respectively) in the text of ADR. Whilst that position may be argued, the United Kingdom believes that it is more transparent and leads to better understanding of, and compliance with, the system if those groupings are included in the ADR text. A parallel may be drawn with the inclusion of Type B to F organic peroxides

in ADR some years ago when it was subsequently found necessary to also refer to Type A and G organic peroxides because of the confusion caused to users (see 2.2.52.1.6).

5. Therefore the United Kingdom would like to propose the inclusion of these groupings at 2.4.2. to aid clarification of the text:

Grouping A: No dangerous goods above the quantity thresholds in 1.1.3.6.3

Grouping E: No restrictions on transport of dangerous goods

6. Since the last discussion of this proposal by WP.15 the United Kingdom has further considered the groupings that some dangerous goods have been allocated to. Firstly, the United Kingdom believes that UN 2900 (Infectious Substances affecting animals) and UN 2814 (Infectious Substances affecting humans), should be included in Grouping B, rather than Grouping A. It is unlikely that many such consignments will be made, but when they are it is usually because there is a need for their transport as a matter of urgency. The United Kingdom believes, therefore, that to preclude the passage of such substances through any tunnels is unnecessarily restrictive and may be prejudicial to medical research.

#### Proposal

In chapter 2.4.2 the following groupings should be added:

Grouping A: No dangerous goods above the quantities expressed in 1.1.3.6.3

Grouping E: No restrictions on transport of dangerous goods

In chapter 2.4.4 the following should be added to Grouping B:

- Class 6.2: UN Nos 2900 and 2814;
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