

**SAFETY IN ROAD TUNNELS**

**Transmitted by the European Liquefied Petroleum Gas Association (AEGPL)**

(related documents: INF.29, INF.30, INF.31)

**Introduction**

AEGPL acknowledges the importance of increasing safety on roads and, therefore, wishes to contribute to the discussion on Road Tunnels with the aim of ensuring that any decisions taken reflect the control of the total risk to both tunnel users and the surrounding community.

**Proposal**

1. AEGPL has reviewed the comments of the Swiss and Italian Competent Authorities and the earlier proposals for the classification of hazardous materials. We would like to understand the basis for the classification of the materials and whether a risk based approach has been taken, as there appears to be no credit given for the history of safe transport of a particular product or the measures taken to ensure its safety.

⇒ Before enabling future developments and future classification, the basis of the classification should be made clear and should be based on internationally accepted risk assessment.

2. The impact of the classification of road tunnels as proposed may result in:
  - transferring and/or increasing risks on alternative unsuitable roads ( e.g. in mountainous area )
  - isolating communities and customers, preventing them from being supplied by crucial energy sources
  - adding valueless costs for regional economic activities: distributors will have to transfer additional transport costs onto their end customers
  - creating negative environmental impact generated by longer routes and traffic congestion: vehicle emissions ( CO<sub>2</sub>, Nox, particulates ...)

⇒ A global systems approach to managing the total risk is advocated, considering the economic; environmental and safety impact on the local community.

**Recommendation**

As a conclusion, AEGPL recommends to consider delaying any final decision before activities 1 and 2 are completed.

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