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PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Chapter 8.6: Road tunnel restrictions for the passage of vehicles carrying dangerous goods

Transmitted by the Government of Sweden

SUMMARY

Executive Summary:	Clarify the content in the table in Chapter 8.6.
Action to be taken:	In the table's right column: clarify the text stating the scope of restrictions. In the table's left column: insert a slash ("/") in certain tunnel restriction codes containing of more than one letter.
Related documents:	None.

Introduction

1. The Government of Sweden has received a lot of questions regarding the new table in Chapter 8.6. In general, there are two frequently asked questions. One regarding the actual scope of the restrictions listed in the table's right column, and the other one regarding the structure of the tunnel restriction codes in the table's left column.

2. The questions we receive reveal a great deal of confusion about the tunnel restriction codes and the scope of the restrictions listed in the table's right column. Users seem to indicate that when the restriction code has more than one letter, restrictions stated for the second half of the code *only* apply to carriages *other* than those specifically stated for the first part of the code, e.g.:

3. For carriage of UN 1086, VINYL CHLORIDE, STABILIZED, in tank, tunnel restriction code B1D applies. When looking the code up in the table in Chapter 8.6 the following restriction is stated:

“Passage forbidden through tunnels of category B and C when carried in tanks;

Passage forbidden through tunnels of category D and E”.

4. Among users, this text has been interpreted accordingly: for tank carriage, passage is only restricted through tunnels of category B and C – but *not* for passage through tunnels of category D and E, since that is not explicitly detailed for tank carriage. The same problems arise for the rest of the restriction codes having more than one letter.

5. This is very unfortunate and, therefore, we find it desirable to clarify the text in the column stating the restrictions. A clarification would not change the intent of the table, but eliminate the risk of misinterpretation. A more complete description identifying how the restriction code is to be applied is vitally necessary.

6. Furthermore, in order to clarify, we would also like to replace the number “1” in the tunnel restriction codes B1D, B1E, C1D, C1E and D1E with a slash (“/”). This, since the number “1” does not fill any other purpose as to separate the two letters from each other. Inserting a slash would serve that purpose in an indisputable way.

Proposal

7. Amend the Table in Chapter 8.6 as follows (changes underlined):

Tunnel restriction code of the whole load	Restriction
B	Passage forbidden through tunnels of category B, C, D and E
B1000C	<p><u>Carriage where the total net explosive mass per transport unit</u></p> <ul style="list-style-type: none"> - <u>exceeds 1000 kg</u>: Passage forbidden through tunnels of category B, C, D and E; - <u>does not exceed 1000 kg</u>: Passage forbidden through tunnels of category C, D and E

<u>B/D</u>	<u>Tank carriage:</u> Passage forbidden through tunnels of category B, C, <u>D</u> and <u>E</u> ; <u>Other carriage:</u> Passage forbidden through tunnels of category D and E
<u>B/E</u>	<u>Tank carriage:</u> Passage forbidden through tunnels of category B, C, D and <u>E</u> ; <u>Other carriage:</u> Passage forbidden through tunnels of category E
C	Passage forbidden through tunnels of category C, D and E
C5000D	<u>Carriage where the total net explosive mass per transport unit</u> - <u>exceeds 5000 kg:</u> Passage forbidden through tunnels of category C, <u>D</u> and <u>E</u> ; - <u>does not exceed 5000 kg:</u> Passage forbidden through tunnels of category D and E
<u>C/D</u>	<u>Tank carriage:</u> Passage forbidden through tunnels of category C, <u>D</u> and <u>E</u> ; <u>Other carriage:</u> Passage forbidden through tunnels of category D and E
<u>C/E</u>	<u>Tank carriage:</u> Passage forbidden through tunnels of category C, D and <u>E</u> ; <u>Other carriage:</u> Passage forbidden through tunnels of category E
D	Passage forbidden through tunnels of category D and E
<u>D/E</u>	<u>Bulk or tank carriage:</u> Passage forbidden through tunnels of category D and <u>E</u> ; <u>Other carriage:</u> Passage forbidden through tunnels of category E
E	Passage forbidden through tunnels of category E
–	Passage allowed through all tunnels (For UN Nos. 2919 and 3331, see also 8.6.3.1).

Consequential amendments:

8. In Table A: Change the tunnel restriction codes accordingly.

Justification:

9. Considering the amount of questions we have received regarding the table in Chapter 8.6, we believe it is necessary to clarify the content in the table in order to make it more user friendly and to avoid the drivers making mistakes.

Safety implications:

10. Clarifications would promote and increase the level of safety, since the risks for misinterpretation would be reduced.

Feasibility:

11. No problems foreseen.

Enforceability:

12. The majority of the ADR Contracting Parties, if any, have not yet had time to implement the new regulations concerning restrictions in road tunnels. We are of the opinion that it would be of great advantage to introduce detailed clarifications, or to make changes in those regulations before the end of the transitional period. Clear language would also support any future enforcement efforts.
