

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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Item 5 of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Comments to the document ECE/TRANS/WP.15/2007/15

Transmitted by the Government of Switzerland

SUMMARY

Executive Summary: Simple solutions for chapter 8.6 and maintain of the existing tunnel restriction codes

Action to be taken:

Related documents: ECE/TRANS/WP.15/2007/15

Introduction

Switzerland undertands the problems caused by the new rules on tunnels in ADR. Nobody has many experience with the new rules so that changes at this stage will need again explanations and difficult the acceptance of the rules which, as everybody is aware, are not easy to be accepted for many other reasons. Because of the low acceptability and of the lack of experiences we believe we should refrain ourselves of unnecessary changes for the moment beeing. Nevertheless we can support the proposals made by Sweden in the second column of the table.

On the contrary, we cannot support the proposal under Point 6. From one side, we believe that the correct understanding of the codes is subject to an appropriate formation. This formation for the ADR drivers has already included the actual codes so that a change of the codes for drivers having already followed the formation according to actual codes would mean that, from the beginning of the application of the rules in the real world in 2010, drivers who have been instructed between 2007 and the 31 of december 2009 will no more be in the position to interpret the meaning of the new codes proposed by Sweden. This, without any gain in safety or clarity because of the reasons explained hereafter.

Point 6 change of "1" to "/" in the classification codes B1D, B1E, C1D, C1E and D1E

The introduction of new codes B/D, B/E, C/D, C/E and D/E is unnecessary and could bring to more strange conclusions.

To what extent the "1" in the code disturbs the understanding of the user is us still not known. A code is simple a code and no meaning should be searched to the content of a code. This question could be solved through an appropriate instruction.

Furthermore the solution proposed by Sweden could bring more wrong interpretations:

What does the code B/E mean? Does it mean that it is forbidden in tunnels B and D but allowed in tunnels C and D?

What does the code B/D mean? Is it allowed to cross tunnels C and E but not B and D?

The same question could be asked for each proposed new code in the swedish proposal.

As Sweden already explains the "1" in the code "B1E" has no meaning. Instead of that a slash "/" could be interpreted as a separation in a list of items (categories of tunnels). So that "B/E" means forbidden in tunnels B and E but not forbidden in other tunnels. The explanations in front of the "B/E" clarify perhaps the real meaning but their also do so in front of "B1E". We don't believe that with "B1E" somebody could come to the conclusion that only the tunnels B and E were forbidden just because the "1" has no meaning in that code.

For this reasons we are not in favor to introduce now new codes which are not more clear as the existing ones.
