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**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods**

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Item 7 of the provisional agenda

**Road tunnel restrictions for the passage of vehicles**

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**Comments on the implementation of tunnel categorisations in ADR Contracting Parties****Transmitted by the International Federation of Freight Forwarder's Associations (FIATA) and the International Road Transport Union (IRU)**

1. Already the 2007 edition of ADR placed an obligation on the national competent authorities to comply with the requirements for the categorisation of road tunnels and restrictions of tunnel passages with dangerous goods until the end of 2009. Section 1.9.5.3.7 of the ADR indicates the following: "*Restrictions shall be published officially and made publicly available. Contracting Parties shall notify the secretariat of UNECE of such restrictions and the secretariat shall make this information publicly available on its website.*"
2. As per these provisions, national authorities had to:
  - Decide and determine the appropriate restrictions in accordance with the system set out in the ADR;
  - Indicate the restrictions by displaying road traffic signs;
  - Publish information on tunnel restrictions at national level and inform the UNECE WP.15 secretariat;by 31 December 2009 at the latest.
3. FIATA and the IRU welcomed these new requirements as both organisations expected a facilitation of transport planning and road transport operations through coded transport document information (tunnel restriction codes) combined with binding and visible tunnel categories by means of road traffic signs, as well as internet information (and, in a later step, additional electronic map systems).
4. Today, consignors, freight forwarders, carriers and other dangerous goods transport professionals have already implemented the ADR tunnel requirements through supplementary ADR transport document information (tunnel restriction codes) and advance driver training. However, the majority of ADR countries have not yet managed to have their tunnels categorised according to the requirements of ADR, or even disseminated information needed for the industry to organise and carry out international dangerous goods road transportation.
5. The lack of tunnel categorisations and tunnel restriction signs has led to uncertainty and competitive distortion within industries and some tunnel operators have started

deviating from ADR tunnel categorisation principals by individually adding single UN numbers to the various categories given by the ADR.

6. If ADR Contracting Parties keep ignoring the ADR provisions on tunnel categorisation and restrictions the situation will remain as it was before 2007, where every individual road tunnel operator was free to decide on the type and amount of dangerous goods to be prohibited.

7. As international transport companies need reliable data and information on infrastructure restrictions, FIATA and the IRU urge all ADR Contracting Parties to fulfil their obligations set out in the ADR and classify tunnels, display respective ADR road traffic signs and publish information as soon as possible.

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