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

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Item 6 of the provisional agenda
Road tunnel restrictions for the passage of vehicles

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Transmitted by the European Industrial Gases Association (EIGA)

1. The tunnel restrictions as required in ADR are now in place, and as a result, member companies of the European Industrial Gases Association have been able to assess the impact of these restrictions on their operations.

2. EIGA welcomes the clarification these tunnel restrictions have brought, and equally supports the enhanced level of safety they should produce. However, there have been some questions raised regarding the tunnel restriction code of a number of products in particular when the vehicles are nominally empty. The specific issues that EIGA have relate to refrigerated products of Class 2, group A, typically Argon, Nitrogen and Carbon Dioxide.

3. EIGA members have carried out some initial reviews that suggest more detailed investigations on these specific products and modelling could lead to an alteration in the tunnel restriction code for these products. EIGA fully recognises that before any changes are made they will need to be rigorously reviewed by the WP.15 and other experts.

4. Prior to embarking on any more work on this subject, EIGA would like to request the opinion of the experts of the WP.15 on this proposal as well as any guidance.