

**Economic Commission for Europe**

Inland Transport Committee

**Working Party on the Transport of Dangerous Goods**

**15 April 2011**

**Ninetieth session**

Geneva, 3–5 May 2011

Item 6 (b) of the provisional agenda

**Proposals for amendments to Annexes A and B of ADR:**

**Miscellaneous proposals**

**Safety in road tunnels  
explanation of § 2 of document ECE/TRANS/WP.15/2011/2**

**Transmitted by the Government of Switzerland\***

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\* The present document is submitted in accordance with paragraph 1 (c) of the terms of reference of the Working Party, as contained in document ECE/TRANS/WP.15/190/Add.1, which provides a mandate to “develop and update the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)”.

1. The § 2 in document ECE/WP.15/2011/2 tries to illustrate the advantages of an adequate control of the risks in tunnels which could be achieved by a better control of the limited quantities in tunnels. In § 2 there is question of 47 entries that would be subject to real disruption. The sentence has to be understood under the assumption that instead of the actual code "E" a tunnel would be assigned another tunnel category, for example "D" if the limited quantities could be restricted. The concerned 47 entries should be understood as those entries to which another tunnel restriction code as the code "E" has been assigned to in ADR. The list of these entries is given in the table below. In the version of the ADR 2011 we find only 45 entries instead of the 47 referred entries in § 2.

2. Some of this entries are very common products. They could eventually be carried as limited quantities over 8 tons. Remembering the consequences of the presence of exactly this kind of products during an accident which happened in tunnel, the tunnel operators will be more inclined to maintain the risks in their tunnels as low as possible, that is by maintaining a tunnel in category "E", as long as the possibility of controlling the passage through tunnels of such products in such quantities is not given in the regulation. If however the possibility of management of such consignments is given for the carriages in limited quantities, a better management of the risks could be achieved and a less stringent tunnel categorization could be chosen. By choosing for example the category "D" instead of "E", 1612 entries could pass through the tunnel in limited quantities because those 1612 entries are not forbidden in tunnel category "D". In addition not only the limited quantities carriages would benefit of this lower categorization but also 2246 entries having the tunnel restriction code "E" and carried as normal dangerous goods could pass the tunnel "D".

<b>UN No.</b>	<b>Name and description</b>	<b>Class</b>	<b>Classification code</b>	<b>Packing group</b>	<b>Labels</b>	<b>Limited and excepted quantities</b>	<b>Transport category (Tunnel restriction code)</b>
<b>(1)</b>	<b>(2)</b>	<b>(3a)</b>	<b>(3b)</b>	<b>(4)</b>	<b>(5)</b>	<b>(7a)</b>	<b>(15)</b>
	<b>3.1.2</b>	<b>2.2</b>	<b>2.2</b>	<b>2.1.1.3</b>	<b>5.2.2</b>	<b>3.4.6</b>	<b>1.1.3.6 (8.6)</b>
1204	NITROGLYCERIN SOLUTION IN ALCOHOL with not more than 1% nitroglycerin	3	D	II	3	1 L	2 (B)
1950	AEROSOLS, flammable	2	5F		2.1	1 L	2 (D)
1950	AEROSOLS, flammable, corrosive	2	5FC		2.1 +8	1 L	1 (D)
1950	AEROSOLS, toxic	2	5T		2.2 +6.1	120 ml	1 (D)

1950	AEROSOLS, toxic, corrosive	2	5TC		2.2 +6.1 +8	120 ml	1 (D)
1950	AEROSOLS, toxic, flammable	2	5TF		2.1 +6.1	120 ml	1 (D)
1950	AEROSOLS, toxic, flammable, corrosive	2	5TFC		2.1 +6.1 +8	120 ml	1 (D)
1950	AEROSOLS, toxic, oxidizing	2	5TO		2.2 +5.1 +6.1	120 ml	1 (D)
1950	AEROSOLS, toxic, oxidizing, corrosive	2	5TOC		2.2 +5.1 +6.1 +8	120 ml	1 (D)
2037	RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) without a release device, non-refillable	2	5F		2.1	1 L	2 (D)
2037	RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) without a release device, non-refillable	2	5T		2.3	120 ml	1 (D)
2037	RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) without a release device, non-refillable	2	5TC		2.3 +8	120 ml	1 (D)
2037	RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) without a release device, non-	2	5TF		2.3 +2.1	120 ml	1 (D)

	refillable						
2037	RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) without a release device, non-refillable	2	5TFC		2.3 +2.1 +8	120 ml	1 (D)
2037	RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) without a release device, non-refillable	2	5TO		2.3 +5.1	120 ml	1 (D)
2037	RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) without a release device, non-refillable	2	5TOC		2.3 +5.1 +8	120 ml	1 (D)
2059	NITROCELLULOSE SOLUTION, FLAMMABLE with not more than 12.6% nitrogen, by dry mass, and not more than 55% nitrocellulose (vapour pressure at 50 °C more than 110 kPa)	3	D	II	3	1 L	2 (B)
2059	NITROCELLULOSE SOLUTION, FLAMMABLE with not more than 12.6% nitrogen, by dry mass, and not more than 55% nitrocellulose (vapour pressure at 50 °C not more than 110 kPa)	3	D	II	3	1 L	2 (B)
2059	NITROCELLULOSE SOLUTION, FLAMMABLE with not more than 12.6% nitrogen, by dry mass, and not more	3	D	III	3	5 L	3 (B)

	than 55% nitrocellulose						
2956	5-tert-BUTYL-2,4,6-TRINITRO-m-XYLENE (MUSK XYLENE)	4.1	SR1	III	4.1	5 kg	3(D)
3101	ORGANIC PEROXIDE TYPE B, LIQUID	5.2	P1		5.2 +1	25 ml	1 (B)
3102	ORGANIC PEROXIDE TYPE B, SOLID	5.2	P1		5.2 +1	100 g	1 (B)
3103	ORGANIC PEROXIDE TYPE C, LIQUID	5.2	P1		5.2	25 ml	1 (D)
3104	ORGANIC PEROXIDE TYPE C, SOLID	5.2	P1		5.2	100 g	1 (D)
3105	ORGANIC PEROXIDE TYPE D, LIQUID	5.2	P1		5.2	125 ml	2 (D)
3106	ORGANIC PEROXIDE TYPE D, SOLID	5.2	P1		5.2	500 g	2 (D)
3107	ORGANIC PEROXIDE TYPE E, LIQUID	5.2	P1		5.2	125 ml	2 (D)
3108	ORGANIC PEROXIDE TYPE E, SOLID	5.2	P1		5.2	500 g	2 (D)
3109	ORGANIC PEROXIDE TYPE F, LIQUID	5.2	P1		5.2	125 ml	2 (D)
3110	ORGANIC PEROXIDE TYPE F, SOLID	5.2	P1		5.2	500 g	2 (D)
3221	SELF-REACTIVE LIQUID TYPE B	4.1	SR1		4.1 +1	25 ml	1 (B)
3222	SELF-REACTIVE SOLID TYPE B	4.1	SR1		4.1 +1	100 g	1 (B)
3223	SELF-REACTIVE LIQUID TYPE C	4.1	SR1		4.1	25 ml	1 (D)

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3224	SELF-REACTIVE SOLID TYPE C	4.1	SR1		4.1	100 g	1 (D)
3225	SELF-REACTIVE LIQUID TYPE D	4.1	SR1		4.1	125 ml	2 (D)
3226	SELF-REACTIVE SOLID TYPE D	4.1	SR1		4.1	500 g	2 (D)
3227	SELF-REACTIVE LIQUID TYPE E	4.1	SR1		4.1	125 ml	2 (D)
3228	SELF-REACTIVE SOLID TYPE E	4.1	SR1		4.1	500 g	2 (D)
3229	SELF-REACTIVE LIQUID TYPE F	4.1	SR1		4.1	125 ml	2 (D)
3230	SELF-REACTIVE SOLID TYPE F	4.1	SR1		4.1	500 g	2 (D)
3241	2-BROMO-2- NITROPROPANE-1,3- DIOL	4.1	SR1	III	4.1	5 kg	3 (D)
3242	AZODICARBONAMIDE	4.1	SR1	II	4.1	1 kg	2 (D)
3251	ISOSORBIDE-5- MONONITRATE	4.1	SR1	III	4.1	5 kg	3 (D)
3478	FUEL CELL CARTRIDGES or FUEL CELL CARTRIDGES CONTAINED IN EQUIPMENT or FUEL CELL CARTRIDGES PACKED WITH EQUIPMENT, containing liquefied flammable gas	2	6F		2.1	120 ml	2 (B/D)

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3479	FUEL CELL CARTRIDGES or FUEL CELL CARTRIDGES CONTAINED IN EQUIPMENT or FUEL CELL CARTRIDGES PACKED WITH EQUIPMENT, containing hydrogen in metal hydride	2	6F		2.1	120 ml	2 (B/D)
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