Interpretation concerning indication of tunnel restriction codes in the transport document

Transmitted by the Government of Sweden

1. According to 5.4.1.1.1 (k), the tunnel restriction code given in Column (15) of Table A of Chapter 3.2 shall be added in the transport document.

2. Recalling the discussions that took place during the seventy-ninth session of WP.15, before the regulations concerning tunnel restrictions were introduced in ADR, the tunnel restriction code should be added in the transport document in the exact same way as given in Table A. This opinion was based on the fact that it would not be fortunate to allow some restriction codes to be split and some not. E.g. when restriction codes B1000C or C5000D is allocated to a substance, it would not be sufficient to only state part of the restriction code, since the total net of the explosive load might change during the transport.

3. However, according to information from carriers and safety advisers, it becomes more and more common within countries to only state part of the code in cases the code consists of two parts, e.g. code D/E.
   
   Example: UN 1170 belongs to tunnel restriction code D/E. In case this substance is carried in tank the code is split and only "(D)" is stated in the transport document, and if the substance is carried in packagings only "(E)" is stated in the transport document.

4. The Government of Sweden would like to hear other countries views on this matter.