

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 4 of the provisional agenda

Interpretation of ADR

23 April 2013

Tunnel restrictions

Transmitted by the government of Switzerland

Summary

Executive summary:	The tunnel restriction for the UN-Number 3291 should be brought applicable
Action to be taken:	Add to 1.9.5.3.6 the text of 8.6.3.1
Related documents:	ECE/TRANS/WP.1/119/Rev.2

Introduction

1. We would like to make known to the WP.15 a paradoxical situation which we detected in relation to the entry with UN-Number 3291 for which no tunnel restriction code was assigned in the column (15) of Table A of chapter 3.2.
2. The carriers learn in 8.6.3.1 that "The restrictions for the transport of specific dangerous goods through tunnels are based on the tunnel restriction code of these goods, indicated in Column (15) of Table A of Chapter 3.2. The tunnel restriction codes are put between brackets at the bottom of the cell. When '(–)' is indicated instead of one of the tunnel restriction codes, the dangerous goods are not subject to any tunnel restriction;...".
3. However according to the amendments adopted by the WP.1 in September 2011 (http://www.unece.org/unece/dev/colo/iway.ch/fileadmin/DAM/trans/main/wp1/wp1fdoc/RE_2_AMEND_2011_09.pdf) in the recommendations of the Resolution on Road Signs and Signals (R.E.2), in the chapter 1.11 a) it is indicated that "Sign C, 3h "NO ENTRY FOR VEHICLES CARRYING DANGEROUS GOODS FOR WHICH SPECIAL SIGN PLATING IS PRESCRIBED" described in the 1968 Convention on Road Signs and Signals should be used without an additional panel to prohibit the entry of all vehicles defined in Article 1 (a) of the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) carrying dangerous goods defined in Article 1 (b) of ADR for which orange-coloured plates according to section 5.3.2 of Annex A of ADR for marking of vehicles are required on the vehicles or, for tunnels, under the conditions for carriage which are specified in 1.9.5.3.6 of Annex A of ADR."
4. The text "or, for tunnels, under the conditions for carriage which are specified in 1.9.5.3.6 of Annex A of ADR. " which was added recently explains the sense to be given to the signal C 3h. In the same way it is also explained for the signals D, 10a; D, 10b and D,

10c "DIRECTIONS IN WHICH VEHICLES CARRYING DANGEROUS GOODS SHALL PROCEED".

5. The wording of the text 1.9.5.3.6 ADR is as follows:

"1.9.5.3.6 Tunnel restrictions shall apply to transport units for which an orange-coloured plate marking in accordance with 5.3.2 is required ..."

6. For the entry UN 3291 an orange-coloured plate is obligatory when the loading exceeds 333 kg in accordance with 1.1.3.6.

7. Thus what is indicated in 8.6.3.1 concerning the non applicability of prohibitions of passage in the tunnels when "(–)" is indicated in column (5) table A is not exact for the UN 3291 because according to the text of the R.E.2. and of the 1.9.5.3.6 which is referred there, the signal C 3h and the signals D, 10a; D, 10b and D, 10c apply for the vehicles subjected to the obligation to carry an orange panel according to the 5.3.2. This will be the case for the UN 3291 as soon as the quantity of 333 kg is exceeded. In spite of the fact that this waste does not have a code of restriction in tunnel, owing to the fact that they are transported with orange panels they are subjected to the prohibition of passage in the tunnels but nobody can say through which tunnels they are prohibited. This is likely to cause difficulties with the access of the restricted tunnels.

8. The modification introduced by the WP.1 into the R.E.2 in September 2011 which refers to 1.9.5.3.6 to manage the applicability of the restrictions in the tunnels makes it possible for us to solve this paradox without appealing once again to the WP.1 to define the applicability of prohibitions of passage in the tunnels by modifying in an adequate way 1.9.5.3.6 ADR.

Proposal 1

9. In 1.9.5.3.6 add the following text:

"1.9.5.3.6 ...

When "(–)" is indicated instead of one of the tunnel restriction codes in the column (15) of table A of chapter 3.2, the dangerous goods are not subject to any tunnel restriction; for the dangerous goods assigned to UN Nos. 2919 and 3331, restrictions to the passage through tunnels may, however, be part of the special arrangement approved by the competent authority(ies) on the basis of 1.7.4.2."
