

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

108th session

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Geneva, 10–13 November 2020

Item 5 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:
miscellaneous proposals**

Comments on 2020/4: Deletion of the tunnel restriction code for excepted packages (UN 2908 to 2911) in Table A of Chapter 3.2

Transmitted by the United Kingdom

Summary

Executive summary: In addition to UN 2908 to 2911, a large number of other UN entries are assigned to both transport category 4 and tunnel restriction code E, and can only be carried as packages. These entries should also be considered when discussing whether this combination transport category and tunnel restriction code is logical.

Related documents: ECE/TRANS/WP.15/2020/4

Introduction

1. Part of the reasoning given in 2020/4 for changing the tunnel restriction code of UN 2908 to 2911 from E to (-) is that an unlimited number of these packages can be carried in a transport unit under the 1.1.3.6 exemption. Dangerous goods carried in accordance with 1.1.3 (aside from some limited quantity loads) are not subject to tunnel restrictions, as per 8.6.3.3.
2. All UN entries assigned to transport category 4 in column (15) of the dangerous goods list are also assigned to tunnel restriction code E. In total, this is 63 entries including UN 2908 to 2911. Four of these entries can also be carried in tanks or in bulk; however, the other 59 entries do not have provisions referenced under columns (10), (12) or (17) and can only be carried in packages. These UN entries should also be considered in any discussions of whether it is appropriate to apply both transport category 4 and tunnel restriction code E.
3. Should the Working Party agree the current policy on tunnel restrictions is disjointed for these UN entries, amending the tunnel restriction code from E to (-) is not the only option to resolve this. We should consider whether these goods present a danger in category E tunnels. It may be that amending the way the provisions are implemented, or amending the transport category of some UN entries, is more appropriate.

4. The entries which are assigned to transport 4 and tunnel restriction code E are given below.

a. Entries which also have bulk or tank carriage options:

UN No.	Name and description	Class	Classification code
1345	RUBBER SCRAP or RUBBER SHODDY, powdered or granulated	4.1	F1
1361	CARBON, animal or vegetable origin	4.2	S2
1362	CARBON, ACTIVATED	4.2	S2
3509	PACKAGINGS, DISCARDED, EMPTY, UNCLEARED	9	M11

b. Entries which can only be transported as packages:

UN No.	Name and description	Class	Classification code
0012	CARTRIDGES FOR WEAPONS, INERT PROJECTILE or CARTRIDGES, SMALL ARMS	1	1.4S
0014	CARTRIDGES FOR WEAPONS, BLANK or CARTRIDGES, SMALL ARMS, BLANK or CARTRIDGE FOR TOOLS, BLANK	1	1.4S
0044	PRIMERS, CAP TYPE	1	1.4S
0055	CASES, CARTRIDGE, EMPTY, WITH PRIMER	1	1.4S
0070	CUTTERS, CABLE, EXPLOSIVE	1	1.4S
0105	FUSE, SAFETY	1	1.4S
0110	GRENADES, PRACTICE, hand or rifle	1	1.4S
0131	LIGHTERS, FUSE	1	1.4S
0173	RELEASE DEVICES, EXPLOSIVE	1	1.4S
0174	RIVETS, EXPLOSIVE	1	1.4S
0193	SIGNALS, RAILWAY TRACK, EXPLOSIVE	1	1.4S
0323	CARTRIDGES, POWER DEVICE	1	1.4S
0337	FIREWORKS	1	1.4S
0345	PROJECTILES, inert with tracer	1	1.4S
0349	ARTICLES, EXPLOSIVE, N.O.S.	1	1.4S
0366	DETONATORS FOR AMMUNITION	1	1.4S
0367	FUZES, DETONATING	1	1.4S
0368	FUZES, IGNITING	1	1.4S
0373	SIGNAL DEVICES, HAND	1	1.4S
0376	PRIMERS, TUBULAR	1	1.4S
0384	COMPONENTS, EXPLOSIVE TRAIN, N.O.S.	1	1.4S
0404	FLARES, AERIAL	1	1.4S
0405	CARTRIDGES, SIGNAL	1	1.4S
0432	ARTICLES, PYROTECHNIC for technical purposes	1	1.4S
0441	CHARGES, SHAPED, without detonator	1	1.4S
0445	CHARGES, EXPLOSIVE, COMMERCIAL without detonator	1	1.4S
0454	IGNITERS	1	1.4S
0455	DETONATORS, NON-ELECTRIC for blasting	1	1.4S
0456	DETONATORS, ELECTRIC for blasting	1	1.4S

0460	CHARGES, BURSTING, PLASTICS BONDED	1	1.4S
0481	SUBSTANCES, EXPLOSIVE, N.O.S.	1	1.4S
0500	DETONATOR ASSEMBLIES, NON-ELECTRIC for blasting	1	1.4S
0506	SIGNALS, DISTRESS, ship	1	1.4S
0507	SIGNALS, SMOKE	1	1.4S
0513	DETONATORS, ELECTRONIC programmable for blasting	1	1.4S
1331	MATCHES, 'STRIKE ANYWHERE'	4.1	F1
1944	MATCHES, SAFETY (book, card or strike on box)	4.1	F1
1945	MATCHES, WAX 'VESTA'	4.1	F1
2254	MATCHES, FUSEE	4.1	F1
2623	FIRELIGHTERS, SOLID with flammable liquid	4.1	F1
2908	RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - EMPTY PACKAGING	7	
2909	RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - ARTICLES MANUFACTURED FROM NATURAL URANIUM or DEPLETED URANIUM or NATURAL THORIUM	7	
2910	RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - LIMITED QUANTITY OF MATERIAL	7	
2911	RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - INSTRUMENTS or ARTICLES	7	
3268	SAFETY DEVICES, electrically initiated	9	M5
3499	CAPACITOR, ELECTRIC DOUBLE LAYER (with an energy storage capacity greater than 0.3Wh)	9	M11
3508	CAPACITOR, ASYMMETRIC (with an energy storage capacity greater than 0.3Wh)	9	M11
3537	ARTICLES CONTAINING FLAMMABLE GAS, N.O.S.	2	6F
3538	ARTICLES CONTAINING NON-FLAMMABLE, NON TOXIC GAS, N.O.S.	2	6A
3539	ARTICLES CONTAINING TOXIC GAS, N.O.S.	2	6T
3540	ARTICLES CONTAINING FLAMMABLE LIQUID, N.O.S	3	F3
3541	ARTICLES CONTAINING FLAMMABLE SOLID, N.O.S.	4.1	F4
3542	ARTICLES CONTAINING A SUBSTANCE LIABLE TO SPONTANEOUS COMBUSTION, N.O.S.	4.2	S6
3543	ARTICLES CONTAINING A SUBSTANCE WHICH IN CONTACT WITH WATER EMITS FLAMMABLE GASES, N.O.S.	4.3	W3
3544	ARTICLES CONTAINING OXIDIZING SUBSTANCE, N.O.S.	5.1	O3
3545	ARTICLES CONTAINING ORGANIC PEROXIDE, N.O.S.	5.2	P1 or P2
3546	ARTICLES CONTAINING TOXIC SUBSTANCE, N.O.S.	6.1	T10
3547	ARTICLES CONTAINING CORROSIVE SUBSTANCE, N.O.S.	8	C11
3548	ARTICLES CONTAINING MISCELLANEOUS DANGEROUS GOODS, N.O.S.	9	M11