

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

(Seventy-third session,
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SAFETY IN ROAD TUNNELS

Comments on the proposal from Austria in doc. TRANS/WP.15/2002/21

Submitted by European Industrial Gases Association (EIGA)

SUMMARY

Executive summary: This paper proposes that the description of the packages and tanks for gases is changed to clarify whether pressure drums, bundles etc. are permitted or not.

Action to be taken: Modify the new table in 1.9.4 proposed by Austria.

Related documents: TRANS/WP.15/2002/15

Introduction

EIGA fully supports the intention of the OECD/PIARC work and, in particular, welcomes the proposal from Austria to include the tunnel classifications in the ADR. Distribution of dangerous goods is made unnecessarily difficult because tunnels have so many different combinations of restrictions on which dangerous goods can be carried through. Often, it is quite difficult to find out in advance what the restrictions are and this can create undesirable delay and friction at the control point for the tunnel, not to mention unnecessary costs for the carrier. If a single rationally based set of options can be adopted for all tunnel authorities to choose from, the task of the carrier to carry goods in accordance with the regulations will be made simpler.

Our proposal therefore aims to make the proposed restrictions clearer, removing the uncertainty as to what is included in the expression 'gases in tanks, cylinders and aerosols'. Gases are carried in a wide range of receptacles other than gas cylinders, such as pressure drums, bundles and cryogenic receptacles. Also, as well as tanks, gases are carried in MEGCs and battery vehicles. Therefore, EIGA proposes that the generic word 'receptacle' should replace the word 'cylinder' and that 'battery vehicle and MEGC' should appear after the word 'tank'.

Proposal

The proposed new words in the table on page 3 of TRANS/WP.15/2002/21 are shown underlined and the deletions by strikethrough.

Class	Groupings (see NOTES 1 and 2)				
	A	B	C	D	E
2	All	A, O, T, TC, TO, TOC gases in tanks, <u>battery vehicles, MEGCs, receptacles</u> eylinders and aerosols C, CO and FC gases in aerosols F, TF and TFC gases in eylinders <u>receptacles</u> and aerosols only	A, O and F gases in eylinders receptacles and aerosols only	A, O and F gases in eylinders receptacles and aerosols only	Below ADR subsection 1.1.3.6 threshold only

Justification and safety implications

The proposed text clarifies the scope of the restrictions and therefore makes compliance and enforcement easier.