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Working Party on the Transport of Dangerous Goods
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SAFETY IN ROAD TUNNELS

**Preliminary questions concerning the work of the informal
working group on safety in tunnels**

Transmitted by the Government of Spain

The road traffic authorities should take account of a number of factors which do not correspond to legal provisions because tunnels are structures adapted to each individual situation; their infrastructure and equipment are specific to them, as are their real or potential traffic flows, emergency services arrangements and users' habits.

The road traffic authorities should also think of traffic on all roads and not only in tunnels. An alternative route to a tunnel may involve other hazards. Even when an alternative route only uses roads in the open, account needs to be taken of the proximity of urban centres, the protection of the environment, difficulties of access or the proximity of industrial zones.

ADR should constitute a permanent tool, enabling the competent authorities to establish conditions for traffic in this context by explaining the potential hazards of each dangerous goods grouping. This is the goal of the OECD/PIARC recommendations.

The Spanish delegation is of the opinion that the WP.15 Working Party should establish certain directions in this regard before the second meeting of the informal working group on safety in tunnels and specify a frame of reference so that the group can develop these ideas. A number of questions of principle are therefore listed below:

1. Competence of regulations concerning dangerous goods traffic in tunnels

The Working Party should inform the informal working group on safety in tunnels of the scope of the provisions to be discussed by it:

(a) ADR provisions relating to tunnels will come within a framework of recommendations; or

(b) The implementation of ADR provisions relating to tunnels is mandatory. The competent authorities must restrict traffic in tunnels only through recourse to the ADR grouping system; or

(c) A compromise solution, i.e. that ADR provisions relating to tunnels are not mandatory if a quantitative risk analysis shows that they are unnecessary.

2. Reference to subsection 1.1.3.6

It should be pointed out that the magnitude of the consequences of an accident (particularly fire, leaks of toxic gas or explosion) in a tunnel is greater than on a road in the open.

The WP.15 Working Party should inform the informal working group on safety in tunnels whether the references to 1.1.3.6 are appropriate or not.

It must also be decided whether limited quantities and goods prepared for retail sale are exempted.

3. Marking of vehicles and signs and signals in tunnels

The WP.15 Working Party should also decide whether additional marking of vehicles and signs and signals in tunnels are mandatory or recommended.

4. Documentation

The WP.15 Working Party should further decide whether it is necessary to mention in the transport document the grouping to which the load belongs. When there are several consignees, this particular may change during the transport operation.
