

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

Simplification and alignment of Tunnel category E text and 1.9.5.2.2 of ADR

Transmitted by the Government of the United Kingdom

Summary

Executive summary: In reviewing the proposals in working papers ECE/TRANS/WP.15/2015/2 and ECE/TRANS/WP.15/2015/5 the representative of the United Kingdom became aware that the current text for category E tunnels in 1.9.5.2.2 and the associated text in 1.9.5.3.6 is unnecessarily complicated. This paper proposes revised wording to rectify this situation without altering the scope of the restrictions

Action to be taken: Amend the text in ADR within 1.9.5.2.2

Introduction

- Both ECE/TRANS/WP.15/2015/2 and ECE/TRANS/WP.15/2015/5 are seeking to make alterations to the list of dangerous goods permitted through tunnels of category E. Both papers propose two amendments. In each case the transport category shown in Column (15) of Table A of Chapter 3.2 is amended to ‘(-)’ and secondly the affected UN numbers are added to the list of exceptions in the Tunnel category E text in 1.9.5.2.2.
- In reviewing both these papers the UK noticed that all the UN numbers listed as exempt from tunnel category E are allocated ‘(-)’ in Column (15) of Table A of Chapter 3.2. It was also discovered that in the general application of tunnel restrictions in 1.9.5.3.6, the text takes a different approach. Instead of detailing each UN number exempt from the requirement it simply referred to ‘(-)’ in Column (15) of Table A of Chapter 3.2.
- Whilst both pieces of text at present reach the same conclusion, the potential exists for an alteration to Column (15) of Table A of Chapter 3.2 e.g. from a ‘(letter)’ to a ‘(-)’ or one of the listed ‘(-)’ entries to a ‘(letter)’, with the necessary consequential amendment to the text for category E in 1.9.5.2.2 missed or forgotten. This would create a conflict between the Tunnel category E text and the text of 1.9.5.3.6.

Proposal

4. Add the underlined text and delete the crossed out text to 1.9.5.2.2 of ADR, for tunnel category E as follows (The NOTE remains unchanged):

“1.9.5.2.2

Tunnel category E:

Restriction for the carriage of all dangerous goods other than ~~UN Nos. 2919, 3291, 3331, 3359 and 3373~~ those for which ‘(-)’ is marked in Column (15) of Table A of Chapter 3.2 and for all dangerous goods in accordance with the provisions of Chapter 3.4 if the quantities carried exceed 8 tonnes total gross mass per transport unit.”

Justification

5. This proposed amendment will align the ADR text, simplify the text and remove the possibility of future consequential amendments being missed or forgotten about which would create contradictory text.
