

## ECONOMIC COMMISSION FOR EUROPE

## INLAND TRANSPORT COMMITTEE

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

(Seventy-eighth session, agenda item 5,  
Geneva, 7-11 November 2005)

**Safety in road tunnels****Comments on Document TRANS/WP.15/2005/24****Transmitted by the Government of Germany**

Germany welcomes the comprehensive and valuable work done by the Netherlands with regard to the new regulations on the issue of safety in road tunnels. However, some minor points need, from our point of view, to be adjusted. Unfortunately, due to the national procedures, it was not possible to inform the Dutch colleagues earlier as asked for. Additionally, Germany likes to address the question if a restriction for class 9, classification code M9 is needed (see 4.4 below), as a result of the national consultation.

**1. Classification code FT 2 in tunnel category C**

Germany is still of the opinion that substances of class 3 with classification code FT2 should be assigned to tunnel category C. The reason is that the active agent might not be known in most cases.

Proposal: In 8.6.3.1 tunnel C tunnel code C1 delete the square brackets and keep FT2.

**2. Transitional measures**

The current understanding was that the new requirements on road tunnels shall be applicable as from 1 January 2007. However, tunnel operators and the Governments of the Contracting Parties may not be able to fulfil all procedures and new requirements (e. g. official publication of tunnel restrictions) in due time. For this reason a transitional period is needed. As soon as a category has been assigned to a certain tunnel (including its official publication) and the appropriate road signs have been posted the new operational requirements have to be complied with.

The text proposed by the Netherlands would postpone the application of all new requirements to 1 January 2009 with the effect that road signs of concerned tunnels have to be replaced on this exact date. This would not be feasible from a practical point of view and was surely not intended by the Netherlands.

Proposal: Insert the following new transitional provision: "1.6.x.x The requirements of 1.9.5 shall be complied with from 1 January 2009 at the latest."

### 3. Tunnel categories

3.1 The risk of a large fire was considered to be a “stand-alone” risk.

Proposal: In 8.6.2.1, tunnel D replace “and” by “or”.

3.2 UN No. 3359 is - through special provision 302 - exempted from the application of all ADR provisions except the marking with a fumigating warning sign. Thus, fumigated vehicles will not be marked with orange-coloured plates with the consequence that sign C,3h will not apply to fumigated vehicles.

Proposal: In 8.6.2.1, tunnel E insert “3359” after “3331”.

3.3 Typing error in 8.6.2.3.

Proposal: In 8.6.2.3 delete “D”.

### 4. Restrictions for the transport of dangerous goods through road tunnels (8.6.3)

4.1 Typing error in 8.6.3.1, tunnel D, tunnel code D.

Proposal: For class 2 replace classification code “TP” by “TO”.

4.2 Omission in 8.6.3.1, tunnel D, tunnel code D.

Proposal: For class 2 insert classification code “TF,” after “T,”.

4.3 Typing error in 8.6.3.1, tunnel D, tunnel code D.

Proposal: For class 8 replace classification code “CTI” by “CT1”.

4.4 In 8.6.3.1, tunnel D, tunnel code D for class 9 classification code M10 (solid substances) is assigned to this tunnel code. However, substances with classification code M9 are not assigned and therefore not restricted although they may present a much higher fire risk than solid substances (e. g. liquid aluminium is carried with temperatures of about 1000 °C).

Proposal: For class 9 insert “M9 and” after “classification code”.

4.5 The term “all dangerous goods” covers already “dangerous goods prohibited through a tunnel D”. To avoid duplication the latter might be deleted.

Proposal: In 8.6.3.1, tunnel E delete “Dangerous goods prohibited through tunnel D and in addition:”.

4.6 If proposal 3.2 of this INF-paper has been adopted, UN 3359 shall be inserted in the row of UN numbers.

Proposal: In 8.6.3.1, tunnel E insert “3359” after “3331”.

- 4.7 Paragraph 8.6.3.2 contains a repetition of carriages which are not restricted. This could be considered superfluous with regard to simplification of the provisions and consequently deleted. If this paragraph is not deleted, it needs completion in order to mention all kinds of not restricted carriage.

Proposal 1: Delete 8.6.3.2

Proposal 2: If proposal 1 is not adopted, replace in the first sentence “and” by “,” and insert “and UN 3359 FUMIGATED UNIT” after “DIAGNOSTIC SPECIMENS”.

## **5. Provisions for road signs ... (8.6.4)**

- 5.1 In paragraph 8.6.4.3 the signalisation of tunnel categories is described. However, only for Tunnel A the meaning of the sign is mentioned additionally. This mentioning does not comply with the headline of the paragraph and doubles the content of 8.6.3.1, Tunnel A.

Proposal: Delete “, no restrictions”.

## **6. Part 3, Chapter 3.2**

- 6.1 In the text explaining column 15 of table A some harmonisation of the words used might be helpful.

Proposal 1: On page 9, in the last sentence of the first paragraph replace “tunnel group code” by “tunnel code”.

Proposal 2: In the first sentence of the second paragraph replace “codes” by “tunnel codes”.

- 6.2 In the class-focussed list of tunnel code assignment (page 10) for class 2 the classification codes C and CO are missing and for class 8 a typing error needs correction. Depending on the decision taken on proposal 4.4 classification code M9 shall be added to the entry for class 9.

Proposal 1: For class 2 amend the last line to read “A, O, C, CO (E)”.

Proposal 2: For class 8 replace “CTI” by “CT1”.

Proposal 3: If proposal 4.4 has been adopted amend, for class 9, the second line to read “M9, M10”.

- 6.3 Proposal: Depending on the decision taken on No. 1 delete the square brackets around “[FT2]” in the class-focussed list of tunnel code assignment (page 10) for class 3.
-