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**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

Working Party on the Transport  
of Dangerous Goods  
(Seventy-sixth session,  
agenda item 6  
Geneva, 3-7 May 2004)

**PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR  
SAFETY IN ROAD TUNNELS**

**Comments and proposals on TRANS/WP.15/2004/17**

**Transmitted by the Government of Switzerland**

**SUMMARY**

*Executive summary:* Switzerland makes proposals in order to simplify the rules for tunnels.

*Action to be taken:* Introduce all prescriptions in chapter 8.6 not in 1.9.  
Delete any reference to the sub-section 1.1.3.6.

*Related documents:* TRANS/WP.15/2004/12.  
AC.7/9, -/Add.1 and -/Corr.1, TRANS/WP.15/2003/21, INF.15, INF.18  
and INF.24 from the May 2003 meeting, INF.48 from the October 2003  
RID/ADR/ADN Joint Meeting.  
TRANS/WP.15/2004/17 (ex. INF.3/Rev.1 of January 2004).

**1. Introduction**

In the following proposals we refer to document TRANS/WP.15/2004/17.

## **2. Proposals**

As already mentioned in other papers, Switzerland is not in favour of introducing limitations to the sphere of competence of the States regarding additional safety requirements or restrictions concerning vehicles using certain structures neither such as bridges or tunnels nor for environmentally sensitive areas.

For this reason, we propose to transfer all the texts in TRANS/WP.15/2004/17 which refer to chapter 1.9 in a dedicated chapter 8.6.

Concerning the actual proposals in TRANS/WP.15/2004/17, we have the following remarks:

### **Chapter 1.9**

#### *1.9.5*

It seems not to be necessary to introduce this text in ADR because the referred signals are already in an international regulation.

#### *1.9.7*

It has to be deleted. Taking account of the Inf 48 from the United Kingdom of the last Joint Meeting and our considerations of our Inf 18 from meeting of the May 2003 session of the WP.15, we come to the conclusion that the table of 1.1.3.6 has no sense in order to define any safety level in the case of tunnels. It has been introduced by the OCDE/PIARC group only in order to take account of our legislation which, at that time, had the limits in marginal 10011 as lowest limits to mark a vehicle. We propose to delete everywhere any reference to any table of limits or to quantities. Irrespective of the mass of dangerous goods carried, all drivers carrying dangerous goods should pay special attention when crossing regulated tunnels. As proposed in our document TRANS/WP.15/2004/12, the transport unit shall display orange plates and a transport document shall be available.

This solution would greatly simplify the rules and clarify their use for every user.

### **Chapter 2.4**

#### *2.4.2*

The last sentence seems wrong. For example, class 3 substances of classification code F2 in tanks are prohibited for Grouping D but they are allowed to cross a tunnel of grouping C or B. So the sentence saying “Therefore when an entry into a tunnel is prohibited for Group D, it is also prohibited for groupings B and C; and when entry is prohibited for Grouping C, it is also prohibited for Grouping B but not for Grouping D;” is wrong.

On the contrary, an entry prohibited in Grouping B is also prohibited in Groupings C and D; and an entry prohibited in Grouping C is allowed in Grouping B but not for Grouping D.

#### 2.4.4

If a clause, as already proposed by us, allowing derogations to the table of Inf 15 from May is accepted, we believe that there is no need to introduce arbitrary values for class 1 in the Groupings B and C. This would also greatly simplify the rules and the codes to be used in table 3.2. We do not need to take care of B1000 and C5000. The exemptions until 1000 kg and 5000 kg for some explosives can be introduced from the competent bodies and responsible persons of the safety in tunnels in the cases where this is possible.

B1000 and C5000 can be deleted if the clause allowing derogations is accepted.

### **Chapter 3.2**

If the principle that there cannot be any minimum quantities for regulated tunnels is accepted, the first paragraph referring to 1.1.3.6 can be deleted as well as any reference of it in the table A.

The examples in the third paragraph have to be changed if the principle of not having any values fixed in the table of groupings is accepted.

#### *Table A*

The reference to 1.1.3.6 can be deleted for the reasons already explained.

B1000 and C5000 are unnecessary for the reasons already mentioned.

### **Chapter 8.6**

We refer to our explanations in the Introduction of document TRANS/WP.15/2004/12 which gives the reasons why we cannot agree with the proposed reinterpretation of the signal C, 3<sup>h</sup>.

#### 8.6.1.2

The last indent is a consequence of the actual situation that the Group of Feldkirch has introduced in the table of Groupings of loadings. This shows clearly the paradoxes of this table. We do not understand why infectious substances represent such a big danger in the tunnels that it is necessary to forbid them totally in the tunnels. We believe that it is far more dangerous for the structures and for the life of the persons to carry in unlimited quantities empty, uncleaned packagings of 250 L which had contained flammable substances with PG II. The last ones instead are allowed in all tunnels in unlimited quantities, The WP.15 should look into these inconsistencies before taking any decisions.

#### 8.6.1.4 Sign C, 3<sup>h</sup>, D, 10<sup>a,b</sup> and<sup>c</sup>

For the same reasons that the quantities of dangerous goods cannot follow those of 1.1.3.6, there is no environmental safety justification to allow quantities of environmentally dangerous substances ruled by 1.1.3.6. In most cases, these quantities of 1.1.3.6 are too high to guarantee the protection of the sensible areas. The limitation to marked vehicles can only be accepted if the ADR provides that all quantities require the marking of the vehicle, otherwise we cannot support the limitation to the marked vehicles. Furthermore, the ADR should also make private

individuals and exempted transport carried by professionals aware that they should respect the protected areas or structures when carrying through regulated tunnels or areas.

8.6.2.2

Delete the end of the sentence “i.e. when the carriage is subject to exemption according to the provisions of 1.1.3.6.

8.6.2.4

This explanation is not easy to understand. It seems that there is a contradiction between the first sentence ending with “the load shall be assigned to the most stringent group”, and the rest of the text “Grouping B taking precedence over Groups C and D and C over Group D”. In fact, the grouping which restricts the most substances is not B but D. It is then D which is the most stringent Grouping (apart from E). If we want to maintain the sentence, it should be written: “the load shall be assigned to the less stringent group”.

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