

## ECONOMIC COMMISSION FOR EUROPE

### INLAND TRANSPORT COMMITTEE

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

Eighty-second session  
Geneva, 7-11 May 2007

### PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

#### Section 5.4.1: Dangerous goods transport document and related information

Transmitted by the Government of Sweden

#### SUMMARY

<b>Executive Summary:</b>	In order to regulate that drivers receive correct tunnel restriction codes pertaining to a load, it shall be required that codes are added to the transport document by the consignor.
<b>Action to be taken:</b>	Add a new sub paragraph (j) to 5.4.1.1.1.
<b>Related documents:</b>	ECE/TRANS/WP.15/2007/7

#### *Introduction*

Document ECE/TRANS/WP.15/2007/7 from France, proposes that the tunnel restriction code be inserted in the transport document. Sweden shares this view and has also prepared an informal paper to discuss the same issue. We would, however, prefer to allow a possibility for exemption in certain cases. Our views on this matter are as follows:

In the new regulations regarding restrictions to the passage of vehicles carrying dangerous goods through road tunnels, there is nothing that ensures that drivers receive tunnel restriction codes from consignors. The expert from Sweden is of the opinion that this is unfortunate, since responsibility for checking all the various tunnel restriction codes pertaining to every substance carried, is left solely with the driver. This presupposes that a driver always has access to the ADR, or at least Table A.

Keeping track of the correct tunnel restriction code for a load may not be problematic when carrying one or two various substances. But when the number of substances is greater, it could be problematic. With the tight time restrictions that drive the pace of the transport business, the potential for error is great; it is highly likely that a driver could miss one document and choose a wrong tunnel restriction code. Therefore, we are of the opinion that simplifying the procedures for the drivers is a step in the right direction.

We would like to assure that drivers, to the extent possible and in a practical and reasonable way, are provided with the correct tunnel restriction code(s). The responsibility of assigning the most restrictive code to the whole load, however, inevitably remains with the driver.

With the background of our aforementioned concerns about the potential problems for drivers and subsequent unwanted impact on safety, we would like to propose the following amendments:

### Proposal

Add a new sub paragraph (j) to 5.4.1.1.1 to read as follows:

“(j) *where assigned, the tunnel restriction code for the substance, in capitals within parenthesis. The tunnel restriction code need not be added in the transport document, where the carriage is known beforehand not to pass through a tunnel with restrictions for carriage of dangerous goods.*”

*Consequential amendments (changes; shown in bold type)*

1. Amend the text in the last paragraph under 5.4.1.1.1 as follows:

“The location and order in which the elements of information required appear in the transport document is left optional, except that (a), (b), (c), (d) and **(j)** shall be shown in the order listed above (i.e. (a), (b), (c), (d), **(j)**) with no information interspersed, except as provided in ADR.

Examples of such permitted dangerous goods descriptions are:

"UN 1098 ALLYL ALCOHOL, 6.1 (3), I, **(C1D)**" or  
"UN 1098, ALLYL ALCOHOL, 6.1 (3), PG I, **(C1D)**".”

2. Amend the text in 5.4.1.1.2 as follows:

“...the information required in the transport document, **except for the provisions in 5.4.1.1(j)**, the use of upper or of lower case for entering the information in the transport document is left optional.”

3. Amend the text in 5.4.1.1.3 as follows:

- “WASTE, UN 1230 METHANOL, 3 (6.1), II, **(D1E)**”, or
- “WASTE, UN 1230 METHANOL, 3 (6.1), PG II, **(D1E)**”, or
- “WASTE, UN 1993 FLAMMABLE LIQUID, N.O.S. (toluene and ethyl alcohol), 3, II, **(D1E)**”, or
- “WASTE, UN 1993 FLAMMABLE LIQUID, N.O.S. (toluene and ethyl alcohol), 3, PG II, **(D1E)**”.

4. Amend the first paragraph in 5.4.1.1.6.2.2 as follows:

“...the particulars according to 5.4.1.1.1 (a) to (d) **and (j)** are preceded by...”

and amend the examples as follows:

““EMPTY TANK-VEHICLE, LAST LOAD: UN 1098 ALLYL ALCOHOL, 6.1 (3), I, **(C1D)**” or  
“EMPTY TANK-VEHICLE, LAST LOAD: UN 1098 ALLYL ALCOHOL, 6.1 (3), PG I, **(C1D)**”.”

5. Amend the first paragraph in 5.4.1.2.5.1 as follows:

“... in the order given and immediately after the information required under 5.4.1.1.1 (a) to (c) **and (j)**:”.

**Justification**

We consider that this may be covered by the obligations already stated for the consignor in 1.4.2.1.1 (b), which read as follows: “(b) furnish the carrier with information and data and, if necessary, the required transport documents and accompanying documents (authorizations, approvals, notifications, certificates, etc.), taking into account in particular the requirements of Chapter 5.4 and the tables in Part 3;”.

**Safety implications**

Requiring the addition of tunnel restriction code(s) to the transport document by the consignor, together with the rest of the information required for safe carriage, will increase the level of safety.

**Feasibility**

This would mean that the consignor would have to add one more indication to the transport document which, initially, might cause some extra work like upgrading computer systems. However, once the initial upgrade is complete, considerable time or work will not be added to the consignor.

**Enforceability**

No problems foreseen.

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