

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

Section 5.4.1: Dangerous goods transport document and related information

Transmitted by CEFIC

SUMMARY

Executive Summary:	Cefic is opposed to the proposal requiring the consignor to add tunnel restriction codes on the transport document.
Related documents:	ECE/TRANS/WP.15/2007/7; INF.4

Introduction

Document ECE/TRANS/WP.15/2007/7 from France, proposes that the tunnel restriction code be inserted in the transport document in order to inform the driver about the appropriate tunnel restriction code related to the goods carried on board. Sweden shares this view and has also prepared an informal paper to discuss the same issue (INF 4).

Proposal

CEFIC is of the opinion that the tunnel restriction code should not be included in the transport document but that the information should be directly transferred from the carrier to the driver.

Justification

1. The tunnel restriction code, applicable for a transport unit loaded with different goods, depends on the load requiring the most critical code. Only this tunnel restriction code has to be observed during the specific road transport concerned.

Especially for part load or groupage consignments often only the carrier has all the information about the loaded goods carried on the transport unit and knows the intended route. The applicable code should therefore be considered when the routing of the transport is planned and should be provided directly to the driver before the transport journey starts by those who plan this journey.

2. The information required by ADR/RID to be included in the transport documents should be harmonized amongst transport modes as much as possible in order to facilitate multimodal transports. Requiring the mention of the tunnel restriction code(s) in the transport document (only applicable for ADR shipments) would lead to an additional difference between ADR and RID, and other modes of transport.
3. Just like tank codes or special provisions, tunnel restriction codes for each dangerous good can be directly taken from table A of part 3 ADR. Therefore, including data in the transport document, which go beyond the information required to clearly identify the goods for transport, would only constitute an unnecessary copy of already available information.
4. Additionally the printing of the tunnel restriction codes on the transport documents would require an unjustified adaptation of all electronic data processing and printing systems in the companies concerned.
