

## **Comments on 2011/10 Safety in Road Tunnels**

### **Transmitted by the Government of the United Kingdom**

1. The United Kingdom supports the proposal by AISE in 2011/10, not to adopt into ADR restrictions through Tunnel Category E for dangerous goods packed in limited quantities in excess of 8 tonnes.
2. The United Kingdom agrees that there are multi-modal problems with the adoption of these new restrictions. ADR may only require limited quantity marking for transport units/containers on transport units with a maximum mass exceeding 12 tonnes if the total gross mass of the packages exceeds 8 tonnes. However, for maritime transport, from 01 January 2012 the IMDG Code requires the mark regardless of the quantity. An extreme example of the implications of this is that a transport unit marked in accordance with the IMDG Code may be forbidden through category E tunnels when they only contain one box of dangerous goods in limited quantities.
3. This creates practical problems for consignments on a multi-modal journey. If marked according to the IMDG Code the driver would need to remove the limited quantity marks or be subject to the same restrictions for a load in excess of 8 tonnes.
4. If the WP.15 meeting decides that the text adopted at the last meeting should still be adopted then to assist with multi-modal transport the UK would like to suggest the adoption of a note in 8.6.4. This note would permit transport units marked in accordance with the IMDG Code but carrying less than 8 tonnes of limited quantities through category E tunnels.

### **Proposal**

5. Add a new note to 8.6.4 to read as follows:

“Note 2: Dangerous goods packed in limited quantities undertaking a journey including a maritime leg and marked in accordance with the IMDG Code are not restricted through tunnels of Category E when the quantity of dangerous goods packed in limited quantities on the transport unit does not exceed 8 tonnes total gross mass.”

### **Justification**

6. This proposal will ensure that dangerous goods in limited quantities which are consigned for transport in accordance with the IMDG Code are subject to the same restrictions through category E tunnels as those which are consigned for road transport.

7. This will avoid shipment delays and unnecessary practical problems which the text adopted at the previous meeting will incur for limited quantities on a multi-modal journey.
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