

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Eighty-sixth session,
Geneva, 5-8 May 2009
Agenda item 8

TUNNELS

Section 5.4.1.1.1 (k) : Transport document

Comments of Belgium to ECE/TRANS/WP.15/2009/9 of Portugal

Belgium is not in favor of the proposal contained in ECE/TRANS/WP.15/2009/9 of Portugal, for the following reasons :

1. This would be the second major change to the tunnel restriction codes after their introduction less than three years ago. Given the fact that users are still in the process of implementing and getting used to this entirely new concept, changes that are not absolutely necessary should be avoided at this time.
2. The proposed new 5.4.1.1.1 (k) would read :
“(k) the relevant letter of the tunnel restriction code, where assigned, given in Column (15) of Table A of Chapter 3.2, in capitals within parenthesis. The tunnel restriction code need not ...”

Nowhere, however, it is specified which letter of the tunnel restriction code is relevant for any particular carriage. In chapter 8.6, the tunnel restriction codes are given as indivisible entities (contrary to the tank codes, where the significance of the four constituent parts is explained e.g. in 4.3.4.1.1). This is best illustrated by the fact that the existing tunnel restriction codes can be replaced with other symbols, such as letters of the Greek alphabet (α , β , γ , δ ,...) without having to change anything in the text of the provisions themselves.

The system, proposed by Portugal, can only work after the introduction of a clear and explicit definition of the relevant letter for every possible case

3. Whilst on the one hand this proposal would simplify matters for the drivers, it would on the other complicate the task of the consignors enormously. As many substances (of the same UN-number and packing group) will require different letters on the transport document, in function of their containment system or the quantity carried, it will become much more difficult to introduce the correct letter automatically by means of a computer system.
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