

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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## **SAFETY IN ROAD TUNNELS**

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

#### **Introduction**

There appears to be a fundamental difference in understanding between the Contracting Parties of ADR as to the likely impact of the proposed new requirements for road tunnels. The United Kingdom thought it might be helpful to highlight and clarify some of the key features of the provisions in order to facilitate discussion to achieve an agreed text in time for inclusion within the 2007 ADR agreement.

The key aim of the proposed tunnel provisions is to achieve a unified approach of tunnel categories and signage in order to facilitate a system which is easy for the European dangerous goods industry to understand and comply with. The proposal contained in paper INF 30 submitted jointly by Belgium and the Netherlands largely achieves that key aim.

#### **Risk Assessment**

Some Competent Authorities have expressed concern at a lack of detail as to the content of the risk assessment required to determine a tunnel category. Under the proposed provisions the carrying out of a risk assessment is not mandatory. Most competent authorities will wish to undertake a formal risk assessment. While the OECD / PIARC report gives a comprehensive guide as to what a quantitative risk assessment model (QRAM) should consider (for example environmental impact, material damage, alternative routes) the Competent Authority is free to design and undertake a risk assessment which reflects their own national concerns, for example availability of detour routes or peak time traffic volumes.

The flexibility of the risk assessment for the Competent Authority is designed to address national or regional needs. A system which mandates in detail the content of the risk assessment would be too restrictive to Competent Authorities, assuming of course that agreement could be reached on what a detailed risk assessment should include.

The new provisions for road tunnels do not necessarily mean that substantial changes have to be made to what is currently allowed through specific tunnels, due to the flexibility inherent within the risk assessment approach. Any changes to carriage of specific dangerous goods through specific tunnels must be viewed within the context of the benefits gained of having a uniform approach of identifying tunnel categories and the goods allowed through specific tunnels.

It is worth remembering that the European Directive 2004/54 already requires a risk assessment determined by the Competent Authority concerned to be performed for dangerous goods in tunnels over 500 metres long which are on the Trans European Network. It would be unfortunate if two different approaches to risk assessment were operated in parallel.

### **Proposal**

If some Contracting Parties have specific concerns about the lack of detail of what should be included within the risk assessment, the United Kingdom would suggest amending the text of 1.9.5.1.1 proposed in INF 30 by Belgium and the Netherlands as follows:

- 1.9.5.1.1 When applying restrictions to the passage of vehicles carrying dangerous goods through tunnels, the competent authority shall assign the road tunnel to one of the tunnel categories defined in 1.9.5.2.2 depending on the tunnel characteristics, risk assessment including availability and suitability of alternative routes and traffic management considerations. The same tunnel may be assigned to more than one tunnel category, e.g. depending on the hours of the day, or the day of the week etc.

### **Results of QRAM and Tunnel Categorisation**

If a Contracting Party chooses to use the OECD / PIARC QRAM approach, irrespective of the result of a QRAM, Contracting Parties remain free to choose a different tunnel category if they so wish. The OECD scheme incorporates the use of a Decision Support Model (DSM) to moderate the results of the QRAM. It is still possible for a Contracting Party to undertake a QRAM which might indicate no dangerous goods permitted through a given tunnel but, for other reasons, determine that the tunnel category be changed to one which permits all dangerous goods through, or vice versa.

### **Limited Quantities**

Limited Quantities are a well established part of both ADR and other regulatory regimes and are designed to reflect the lower level of risk that these goods represent. The OECD and PIARC which undertook the scientific analysis of individual dangerous goods and identified the associated risks concluded that Limited Quantities should not be restricted as the risks were not significantly greater in tunnels than on the open road. It is on that basis that work on developing the provisions for ADR have progressed to date. To introduce at this stage in the debate restrictions on limited quantities without supporting scientific analysis and justification is unacceptable. The United Kingdom would therefore oppose any restrictions on limited quantities.

### **Transitional Measures**

The United Kingdom has some sympathy for the concerns expressed that the time remaining for implementation of these provisions is limited. The United Kingdom would therefore suggest inclusion of the provisions within the text of ADR 2007 with a transitional measure until 2009.

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