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Working Party on the Transport of Dangerous Goods

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Item 5 of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Chapter 8.6: Road tunnel restrictions for the passage of vehicles carrying dangerous goods

Transmitted by the International Road Transport Union (IRU)^{*/}

SUMMARY

Executive Summary:	Proposal to maintain the existing tunnel restriction codes for division 8.6.4
Action to be taken:	In the left column of the table: The tunnel restriction codes assigned to transport units should remain the same as the ones stipulated in ADR 2007.
Related documents:	ECE/ TRANS/WP.15/2007/15 and INF. 36 (83rd session).

^{*/} The present document is submitted in accordance with paragraph 1(c) of the terms of reference of the Working Party, as contained in document ECE/TRANS/WP.15/190/Add.1, which provides a mandate to "Develop and update the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)".

Introduction

1. During the eighty-third session of the Working Party WP.15 held in Geneva from 5 to 9 November 2007, the amendment proposed by Sweden concerning road tunnel restrictions (ECE/TRANS/WP.15/2007/15) was adopted. The IRU supports the changes regarding the texts stating the scope of restrictions (column 2).

2. However, the IRU is opposed to the change of restriction codes and asks that the codes remain the same as set in ADR 2007. The decision to change the tunnel restriction codes – by replacing the figure 1 by a slash (/) – is unwise and will not increase the safety and/or the security aspect of the road transport of dangerous goods through tunnels.

Observation

3. The decision to have new codes does not take into account that drivers and security advisers have been undergoing ADR training since the beginning of 2007. The correct understanding of a code is clearly dependent on this training. If we now start to change every two years before having any real experience with the new rules, there is a high risk of weakening the aim of all the rules for the tunnels.

4. The training has already included the present codes as requested in the ADR 2007, so a change of the codes would mean that, as from 1 January 2010, after expiration of the transitional measure in 1.6.1.12, drivers and safety advisers who were trained between 2007 and June 2009 would no longer be able to interpret the meaning of the new codes correctly or would introduce improper corrections in the transport documents until their next ADR training (2012-2014).

5. About a million drivers and security advisers in the ADR contracting parties would be concerned by an “incorrect training” regarding the new codes. This will just reinforce an odd situation of doubt for the properly trained drivers without bringing any gain in safety in the future.

6. The French translation of section 8.6.3, "codes de restriction en tunnels", is not optimal. It would be more correct to replace it by "codes de restriction pour les tunnels".

Action

7. Consequently, the IRU requests WP.15 to keep the existing restriction codes as stipulated in ADR 2007 in order to avoid misinterpretation of the restriction codes for persons who have undergone the mandatory requested ADR training, and a correction of the French title of section 8.6.3.

Consequential amendments

8. In Table A: The existing tunnel restriction codes shall remain as in ADR 2007.

Justification

9. No real experience with the new rules on tunnel restrictions demonstrates that we need to change the existing tunnel restrictions codes (left column of the table 8.6.3). Training demonstrates that drivers and safety advisers are already adequately trained to meet the applicable requirements for the carriage through tunnels as stipulated in ADR 2007.

Safety implications

10. Maintaining the existing tunnel restriction codes as set out in ADR 2007 would consolidate the training and avoid the risk of misinterpretation in the future for already trained drivers.

Feasibility

11. This is just a continuity of the existing rules for the road tunnel restrictions codes.

Enforceability

12. No problems foreseen, as training has already begun on the tunnel restrictions code.
