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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

Remarks on document ECE/TRANS/WP.15/AC.1/2009/16/Add.1
Tunnel restriction codes for toxic by inhalation entries

Transmitted by the Government of Switzerland

SUMMARY

Executive Summary:	To take account for the tunnels the decisions of the Committee of experts of December 2008 concerning the substances toxic by inhalation
Action to be taken:	To apply the tunnel restriction codes which correspond to the substances toxic by inhalation assigning the relevant tunnel restriction codes to the entries 1553, 1595, 1647, 1745, 1746, 1752, 1754, 1809, 1828, 1829, 1834, 2692, 2845 and 2646 and changing 1.9.5.2 .2 for the tunnel category D
Related documents:	ST/SG/AC.10/C.3/2005/51 and ECE/TRANS/WP.15/AC.1/2009/16/Add.1

Introduction

In ADR 2009 some entries have been changed regarding the Tank instruction for UN-Tanks taking account of their toxicity by inhalation. The Tank instruction T20 and T22 were assigned to them. As explained in document ST/SG/AC.10/C.3/2005/51, these tank instructions have the following meaning:

T20: This instruction shall be assigned to substances with an inhalation toxicity less than or equal to 1000 ml/m³ and saturated vapour concentration greater than or equal to 10 LC50.

T22: This instruction shall be assigned to substances with an inhalation toxicity less than or equal to 200 ml/m³ and a saturated vapour concentration greater than or equal to 500 LC50.

In the document ECE/TRANS/WP.15/AC.1/2009/16/Add.1 regarding the harmonization with the UN Recommendations on the transport of dangerous goods all the decisions regarding the introduction of the special provision 354 and the tank instructions T20 and T22 have been taken in consideration when assigning the corresponding tunnel restriction code the concerned UN entries. For all of them the tunnel restriction code "D" has been consequently assigned for the carriage in packaging.

However, by the introduction of the tank instructions T20 and T22 in ADR in 2009 their meaning in relation to tunnel prescriptions has not been taken in consideration. Following what is said under Tunnel category D in 1.9.5.2.2 ADR, under class 6.1 Toxic by inhalation entries should be forbidden through tunnel category D tunnels. For the moment being only the entries UN Nos 3381 to 3390 are mentioned in parenthesis. So we are now confronted with the paradox that in spite the fact that some entries are identified to be toxic by inhalation their have not been assigned to the corresponding tunnel code. In addition to them the new entries identified as toxic by inhalation by the UN-Sub-committee of Experts on Transport of Dangerous goods will be assigned to tunnel restriction code "D" for the carriage in packaging (C/D or B/D depending on their characteristics). In document ECE/TRANS/WP.15/AC.1/2009/16/Add.1, which reflects only the changes of the UN-Recommendations for this biennium, some of the now existing entries in ADR have not been taken in consideration because the UN-Recommendations didn't foresee any change for them this biennium. The changes for them were done the biennium before but were not consequently adapted for the tunnel purposes at that time. These entries are all assigned with the tank instructions T20 or T22. We believe all of them should also be treated in the rationalized approach as toxic by inhalation and the tunnel restriction code "D" for the carriage in packaging should be assigned to them.

Proposal:

Change the Tunnel restriction code in column (15) of table A in chapter 3.2 of the following entries as follows:

For UN. Nos 1745, 1746 and 2845 replace "(B/E)" with "(B/D)" in column (15)

For 1553, 1595, 1647, 1752, 1809 and 2646 replace "(C/E)" with "(C/D)" in column (15).

For 1754, 1828, 1829, 1834, 2692 replace "(E)" with "(D)" in column (15)

Consequential changes

Change in 1.9.5.2 .2 for the tunnel category D the text under class 6.1 as follows:

"Class 6.1: Packing group I for classification codes TF1 and TFC; and
 Toxic by inhalation entries (UN Nos. 1092, 1098, 1135, 1143, 1163,
 1182, 1185, 1238, 1239, 1244, 1251, 1510, 1541, 1553, 1580, 1595,
 1605, 1647, 1670, 1695, 1745, 1746, 1754, 1752, 1809, 1810, 1828,
 1829, 1831, 1834, 1838, 1892, 1994, 2032, 2232, 2334, 2337, 2382,
 2407, 2474, 2477, 2480, 2481 to 2488, 2521, 2605, 2606, 2644,
 2646, 2668, 2692, 2740, 2743, 2845, 3023, 3079, 3246, 3381 to
 3390, 3488 to 3493)

Justification

There is no reason why the listed entries (1553, 1595, 1647, 1745, 1746, 1752, 1754, 1809, 1828, 1829, 1834, 2692, 2845 and 2646) should not be treated as the other toxic by inhalation entries.

In order to ensure that the system brings all its advantages and make it possible to choose tunnel categories which only ban those loads that cannot be accepted in a given tunnel, it is necessary that these inconsistencies are corrected. As long as such inconsistencies remain, the competent authorities and tunnel operators will always tend to choose the more stringent tunnel categories. By assigning the correct tunnel restrictions codes to the dangerous goods it will be possible to assign a less stringent tunnel category to a given tunnel so that more dangerous goods and quantities of other goods will be possible to cross the tunnel. This is for the advantage of the safety as well of the economy.
