**Economic Commission for Europe**

Inland Transport Committee

**Working Party on the Transport of Dangerous Goods**

**108th session 4 November 2020**

Geneva, 10–13 November 2020

Item 5 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:  
miscellaneous proposals**

Comments on 2020/4: Deletion of the tunnel restriction code for excepted packages (UN 2908 to 2911) in Table A of Chapter 3.2

Transmitted by the United Kingdom

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| *Summary* |
| **Executive summary**: In addition to UN 2908 to 2911, a large number of other UN entries are assigned to both transport category 4 and tunnel restriction code E, and can only be carried as packages. These entries should also be considered when discussing whether this combination transport category and tunnel restriction code is logical. |
| **Related documents**: ECE/TRANS/WP.15/2020/4 |
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Introduction

1. Part of the reasoning given in 2020/4 for changing the tunnel restriction code of UN 2908 to 2911 from E to (-) is that an unlimited number of these packages can be carried in a transport unit under the 1.1.3.6 exemption. Dangerous goods carried in accordance with 1.1.3 (aside from some limited quantity loads) are not subject to tunnel restrictions, as per 8.6.3.3.

2. All UN entries assigned to transport category 4 in column (15) of the dangerous goods list are also assigned to tunnel restriction code E. In total, this is 63 entries including UN 2908 to 2911. Four of these entries can also be carried in tanks or in bulk; however, the other 59 entries do not have provisions referenced under columns (10), (12) or (17) and can only be carried in packages. These UN entries should also be considered in any discussions of whether it is appropriate to apply both transport category 4 and tunnel restriction code E.

3. Should the Working Party agree the current policy on tunnel restrictions is disjointed for these UN entries, amending the tunnel restriction code from E to (-) is not the only option to resolve this. We should consider whether these goods present a danger in category E tunnels. It may be that amending the way the provisions are implemented, or amending the transport category of some UN entries, is more appropriate.

4. The entries which are assigned to transport 4 and tunnel restriction code E are given below.

* 1. Entries which also have bulk or tank carriage options:

|  |  |  |  |
| --- | --- | --- | --- |
| UN No. | Name and description | Class | Classification code |
|
| 1345 | RUBBER SCRAP or RUBBER SHODDY, powdered or granulated | 4.1 | F1 |
| 1361 | CARBON, animal or vegetable origin | 4.2 | S2 |
| 1362 | CARBON, ACTIVATED | 4.2 | S2 |
| 3509 | PACKAGINGS, DISCARDED, EMPTY, UNCLEANED | 9 | M11 |

* 1. Entries which can only be transported as packages:

|  |  |  |  |
| --- | --- | --- | --- |
| UN No. | Name and description | Class | Classification code |
|
| 0012 | CARTRIDGES FOR WEAPONS, INERT PROJECTILE or CARTRIDGES, SMALL ARMS | 1 | 1.4S |
| 0014 | CARTRIDGES FOR WEAPONS, BLANK or CARTRIDGES, SMALL ARMS, BLANK or CARTRIDGE FOR TOOLS, BLANK | 1 | 1.4S |
| 0044 | PRIMERS, CAP TYPE | 1 | 1.4S |
| 0055 | CASES, CARTRIDGE, EMPTY, WITH PRIMER | 1 | 1.4S |
| 0070 | CUTTERS, CABLE, EXPLOSIVE | 1 | 1.4S |
| 0105 | FUSE, SAFETY | 1 | 1.4S |
| 0110 | GRENADES, PRACTICE, hand or rifle | 1 | 1.4S |
| 0131 | LIGHTERS, FUSE | 1 | 1.4S |
| 0173 | RELEASE DEVICES, EXPLOSIVE | 1 | 1.4S |
| 0174 | RIVETS, EXPLOSIVE | 1 | 1.4S |
| 0193 | SIGNALS, RAILWAY TRACK, EXPLOSIVE | 1 | 1.4S |
| 0323 | CARTRIDGES, POWER DEVICE | 1 | 1.4S |
| 0337 | FIREWORKS | 1 | 1.4S |
| 0345 | PROJECTILES, inert with tracer | 1 | 1.4S |
| 0349 | ARTICLES, EXPLOSIVE, N.O.S. | 1 | 1.4S |
| 0366 | DETONATORS FOR AMMUNITION | 1 | 1.4S |
| 0367 | FUZES, DETONATING | 1 | 1.4S |
| 0368 | FUZES, IGNITING | 1 | 1.4S |
| 0373 | SIGNAL DEVICES, HAND | 1 | 1.4S |
| 0376 | PRIMERS, TUBULAR | 1 | 1.4S |
| 0384 | COMPONENTS, EXPLOSIVE TRAIN, N.O.S. | 1 | 1.4S |
| 0404 | FLARES, AERIAL | 1 | 1.4S |
| 0405 | CARTRIDGES, SIGNAL | 1 | 1.4S |
| 0432 | ARTICLES, PYROTECHNIC for technical purposes | 1 | 1.4S |
| 0441 | CHARGES, SHAPED, without detonator | 1 | 1.4S |
| 0445 | CHARGES, EXPLOSIVE, COMMERCIAL without detonator | 1 | 1.4S |
| 0454 | IGNITERS | 1 | 1.4S |
| 0455 | DETONATORS, NON-ELECTRIC for blasting | 1 | 1.4S |
| 0456 | DETONATORS, ELECTRIC for blasting | 1 | 1.4S |
| 0460 | CHARGES, BURSTING, PLASTICS BONDED | 1 | 1.4S |
| 0481 | SUBSTANCES, EXPLOSIVE, N.O.S. | 1 | 1.4S |
| 0500 | DETONATOR ASSEMBLIES, NON-ELECTRIC for blasting | 1 | 1.4S |
| 0506 | SIGNALS, DISTRESS, ship | 1 | 1.4S |
| 0507 | SIGNALS, SMOKE | 1 | 1.4S |
| 0513 | DETONATORS, ELECTRONIC programmable for blasting | 1 | 1.4S |
| 1331 | MATCHES, 'STRIKE ANYWHERE' | 4.1 | F1 |
| 1944 | MATCHES, SAFETY (book, card or strike on box) | 4.1 | F1 |
| 1945 | MATCHES, WAX 'VESTA' | 4.1 | F1 |
| 2254 | MATCHES, FUSEE | 4.1 | F1 |
| 2623 | FIRELIGHTERS, SOLID with flammable liquid | 4.1 | F1 |
| 2908 | RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - EMPTY PACKAGING | 7 |  |
| 2909 | RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - ARTICLES MANUFACTURED FROM NATURAL URANIUM or DEPLETED URANIUM or NATURAL THORIUM | 7 |  |
| 2910 | RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - LIMITED QUANTITY OF MATERIAL | 7 |  |
| 2911 | RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - INSTRUMENTS or ARTICLES | 7 |  |
| 3268 | SAFETY DEVICES, electrically initiated | 9 | M5 |
| 3499 | CAPACITOR, ELECTRIC DOUBLE LAYER (with an energy storage capacity greater than 0.3Wh) | 9 | M11 |
| 3508 | CAPACITOR, ASYMMETRIC (with an energy storage capacity greater than 0.3Wh) | 9 | M11 |
| 3537 | ARTICLES CONTAINING FLAMMABLE GAS, N.O.S. | 2 | 6F |
| 3538 | ARTICLES CONTAINING NON-FLAMMABLE, NON TOXIC GAS, N.O.S. | 2 | 6A |
| 3539 | ARTICLES CONTAINING TOXIC GAS, N.O.S. | 2 | 6T |
| 3540 | ARTICLES CONTAINING FLAMMABLE LIQUID, N.O.S | 3 | F3 |
| 3541 | ARTICLES CONTAINING FLAMMABLE SOLID, N.O.S. | 4.1 | F4 |
| 3542 | ARTICLES CONTAINING A SUBSTANCE LIABLE TO SPONTANEOUS COMBUSTION, N.O.S. | 4.2 | S6 |
| 3543 | ARTICLES CONTAINING A SUBSTANCE WHICH IN CONTACT WITH WATER EMITS FLAMMABLE GASES, N.O.S. | 4.3 | W3 |
| 3544 | ARTICLES CONTAINING OXIDIZING SUBSTANCE, N.O.S. | 5.1 | O3 |
| 3545 | ARTICLES CONTAINING ORGANIC PEROXIDE, N.O.S. | 5.2 | P1 or P2 |
| 3546 | ARTICLES CONTAINING TOXIC SUBSTANCE, N.O.S. | 6.1 | T10 |
| 3547 | ARTICLES CONTAINING CORROSIVE SUBSTANCE, N.O.S. | 8 | C11 |
| 3548 | ARTICLES CONTAINING MISCELLANEOUS DANGEROUS GOODS, N.O.S. | 9 | M11 |