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

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

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.
 - a. 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

b. 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

SUBSTANCES, EXPLOSIVE, N.O.S. 1	0460	CHARGES, BURSTING, PLASTICS BONDED	1	1.4S
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TO SPONTANEOUS COMBUSTION, N.O.S. ARTICLES CONTAINING A SUBSTANCE WHICH IN CONTACT WITH WATER EMITS FLAMMABLE GASES, N.O.S. ARTICLES CONTAINING OXIDIZING SUBSTANCE, N.O.S. ARTICLES CONTAINING ORGANIC PEROXIDE, N.O.S. ARTICLES CONTAINING TOXIC SUBSTANCE, N.O.S. ARTICLES CONTAINING TOXIC SUBSTANCE, N.O.S. ARTICLES CONTAINING CORROSIVE SUBSTANCE, N.O.S. ARTICLES CONTAINING CORROSIVE SUBSTANCE, N.O.S. ARTICLES CONTAINING MISCELLANEOUS ARTICLES CONTAINING MISCELLANEOUS M11	3541	· ·	4.1	F4
CONTACT WITH WATER EMITS FLAMMABLE GASES, N.O.S. ARTICLES CONTAINING OXIDIZING SUBSTANCE, N.O.S. ARTICLES CONTAINING ORGANIC PEROXIDE, N.O.S. ARTICLES CONTAINING TOXIC SUBSTANCE, N.O.S. ARTICLES CONTAINING TOXIC SUBSTANCE, N.O.S. ARTICLES CONTAINING CORROSIVE SUBSTANCE, N.O.S. ARTICLES CONTAINING MISCELLANEOUS ARTICLES CONTAINING MISCELLANEOUS ARTICLES CONTAINING MISCELLANEOUS M11	3542		4.2	S6
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N.O.S. ARTICLES CONTAINING TOXIC SUBSTANCE, N.O.S. ARTICLES CONTAINING CORROSIVE SUBSTANCE, N.O.S. ARTICLES CONTAINING MISCELLANEOUS ARTICLES CONTAINING MISCELLANEOUS M11	3544		5.1	О3
N.O.S. ARTICLES CONTAINING CORROSIVE SUBSTANCE, N.O.S. ARTICLES CONTAINING MISCELLANEOUS ARTICLES CONTAINING MISCELLANEOUS M11	3545	The state of the s	5.2	P1 or P2
SUBSTANCE, N.O.S. ARTICLES CONTAINING MISCELLANEOUS 9 M11	3546	*	6.1	T10
3548	3547		8	C11
	3548		9	M11

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