



---

**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods****108th session**

Geneva, 11–15 May 2020

Item 5 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:  
miscellaneous proposals****Deletion of the tunnel restriction code for excepted packages  
(UN 2908 to 2911) in Table A of Chapter 3.2****Submitted by the Government of Germany\****Summary*

**Executive summary:** Tunnel restrictions do not apply to the transport of excepted packages because of the exemptions according to 1.1.3.6 as well as under 1.7.1.5.1. A tunnel restriction code may only be necessary for some mixed loading, but does not have to be indicated in the transport document because of the special provisions for excepted packages under 5.1.5.4.2 (a). Therefore, the driver would not know about the application of a tunnel restriction code. It is considered that for excepted packages under no circumstances a tunnel restriction code is necessary.

**Action to be taken:** Delete the tunnel restriction code in Column (15) of Table A of Chapter 3.2 for UN 2908 to 2911 (excepted packages)

**Introduction**

1. According to 1.9.5.3.6 and 8.6.3.3, dangerous goods are not subject to tunnel restrictions, if the quantity of dangerous goods per transport unit does not exceed the maximum total quantity in Table 1.1.3.6.3.
2. According to 1.9.5.3.6, tunnel restrictions apply for transport units for which an orange-coloured plate marking is required under 5.3.2. But excepted packages are exempted from this requirement (because of the exemptions in 1.1.3.6 as well as under 1.7.1.5.1).
3. For excepted packages, only under the conditions of a mixed loading with dangerous goods for which no tunnel restriction code has been assigned the tunnel restriction code of

---

\* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2)

the excepted package would apply. However the tunnel restriction code does not have to be indicated in the transport document because of the special provisions for excepted packages under 5.1.5.4.2 (a). As a consequence, for such mixed loading the driver would not necessarily be informed about the circumstance that a tunnel restriction code applies.

4. In this regard the following question had to be answered: Was a tunnel restriction code supposed to be applicable for excepted packages when the provisions for tunnel restrictions were introduced? The result of a research of the historical documents in this case was that obviously all dangerous goods which had not been assigned to category A to D were assigned to category E. But according to 1.1.3.6.2 and 1.7.1.5.1, it was not required to apply the tunnel restriction code to transport units containing even unlimited numbers of excepted packages.

5. It is considered that for excepted packages under no circumstances a tunnel restriction code is necessary.

6. Considering the reasons for which the provisions of tunnel restrictions for excepted packages are not applicable and the result of the research on the historical documentation, we propose the following:

## **Proposal**

7. Replace the entry for the tunnel restriction code by the mention “(–)” in Column (15) of Table A of Chapter 3.2 for UN 2908 to 2911 (excepted packages).

---