



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

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Item 5 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:
miscellaneous proposals****Clarification of the application of the tunnel restriction code
for the carriage of empty packagings, uncleaned, in
accordance with section 5.4.1.1.6.2.1 (a) and (b) of ADR****Transmitted by the Government of Germany*****Summary**

1. The aim of this proposal is to clarify the requirements set out in 5.4.1.1.6.2.1 (a) and (b) of ADR regarding the indication of the tunnel restriction code.

Introduction

2. In ADR 2017, a possibility to simplify transport document information for empty packagings, uncleaned, which contain residues of different dangerous goods was included. 5.4.1.1.6.2.1 was amended as follows:¹

“In addition, in such a case:

(a) If the dangerous goods last loaded are goods of Class 2, the information prescribed in 5.4.1.1.1 (c) may be replaced by the number of the class “2”;

(b) If the dangerous goods last loaded are goods of Classes 3, 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 8 or 9, the information of the goods last loaded, as described in 5.4.1.1.1 (c) may be replaced by the words “WITH RESIDUES OF [...]” followed by the class(es) and subsidiary hazard(s) corresponding to the different residues, in the class numbering order.

Example: Empty packages, uncleaned, having contained goods of Class 3 carried together with empty packagings, uncleaned, having contained goods of Class 8 with a Class 6.1 subsidiary hazard may be referred to in the transport document as:

* Subprogramme 2 of the programme budget for 2020 (A/74/6 (Sect. 20) and additional information).

¹ Note by the secretariat: this text also text into account the amendments adopted in ADR 2019 to replace “risk” by “hazard” where appropriate.

“EMPTY PACKAGINGS, WITH RESIDUES OF 3, 6.1, 8”.”

3. In this use case, it is not possible to unambiguously assign a tunnel restriction code as different empty packagings, uncleaned, can intentionally be carried together and no reference can thus be made to a UN number.
4. Similarly, such an assignation would not make sense as empty packagings, uncleaned, fall under transport category 4 in accordance with 1.1.3.6 and are thus not subject to tunnel restrictions (exception: packagings falling under transport category 0).
5. Moreover, the examination of the facts showed that no tunnel code can be assigned for the carriage of empty uncleaned gas cylinders in accordance with 5.4.1.1.6.2.1 (a) of ADR, as in many cases different gases are returned together.
6. For these reasons, it should be clarified that the requirement to indicate the tunnel restriction code does not apply to the aforementioned cases.

Proposal

7. In 5.4.1.1.6.2.1 (a) of ADR, add the following after the semicolon:
“a tunnel restriction code in accordance with 5.4.1.1.1 (k) shall not be indicated.”
In 5.4.1.1.6.2.1 (b) of ADR, add the following sentence at the end:
“A tunnel restriction code in accordance with 5.4.1.1.1 (k) shall not be indicated.”
