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Item 5 of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Section 5.4.1.1.1 (k): Transport document

Transmitted by the Government of the Portugal */

Summary

Executive Summary:	In order to ensure more safety during transport, the dangerous goods transport document give important information which can permit or not, the carriage through certain tunnels. The clearness of the information included in that document is essential for safety reasons.
Action to be taken:	Change the mention in the transport document corresponding to tunnel restriction code.
Related Documents:	ECE/TRANS/202.

*/ The present document is submitted in accordance with paragraph 1(c) of the terms of reference of the Working Party, as contained in document ECE/TRANS/WP.15/190/Add.1, which provides a mandate to “Develop and update the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)”.

Background and analysis

1. ADR 2009 establishes that tunnel restriction code, as presented in column (15) in table A of Chapter 3.2, must be mentioned in the transport document with those elements of identification of dangerous goods which are transported, according to 5.4.1.1.1.
2. Due to the complexity that this provision implies to the correct reading of the transport document, it is necessary to simplify this ADR requirement to enter in the transport document those elements.
3. In section 8.6.4 the tunnels restriction code for transportation units of dangerous goods are defined.

Considerations

4. Due to the necessity of including a broad set of different conditions of consignment, transport and also to define distinct rules depending on the risk presented by the dangerous goods, layout of some tunnel restriction codes is too complicated and may lead to misinterpretation from drivers.
5. For example, in the case of the code B/D it is not necessary to mention in the transport document this entire code, when at the time of loading the vehicle, the consignor already knows that those dangerous goods are packed or in tanks.
6. It may be considered that if the consignor is aware in advance of the conditions of the consignment, the mention in the transport document should only refer to the letter corresponding to the first category of the tunnel from which the restriction is to be applied, according 1.9.5.2.2.
7. If in column (15) in Table A of Chapter 3.2 a tunnel restriction code B/D is presented and if the dangerous goods are packed, only the letter D should appear in transport document.
8. Therefore, the following change is proposed.

Proposal

Amend 5.4.1.1.1 (k) of ADR to read as follows:

- “(k) the relevant letter of the tunnel restriction code, where assigned, given in Column (15) of Table A of Chapter 3.2, in capitals within parenthesis. The tunnel restriction code need not ...”

9. Examples:

For the carriage of UN 1098 ALLYL ALCOHOL tunnel restriction code (C/D) is listed in column (15) of table A:

- For carriage in tanks, according to this proposal, the description in the transport document should read:
UN 1098 ALLYL ALCOHOL, 6.1 (3), I, (C)
- For carriage in packages, the description in the transport document should read:
UN 1098 ALLYL ALCOHOL, 6.1 (3), I, (D)

For a transport operation involving UN 0027 BLACK POWDER, tunnel restriction code (B1000C) is listed in column (15) of table A:

- If the total net explosive mass per transport unit exceeds 1000 kg, according to this proposal, the description in the transport document should read:
UN 0027 BLACK POWDER, 1.1D, (B)
- If the total net explosive mass per transport unit does not exceed 1000 kg, the description in the transport document should read:
UN 0027 BLACK POWDER 1.1D, (C)

Justification

10. This information is more simple for the driver and comprehensive. It permit the driver to know readily the types of tunnels, classified with letters C, D and E, he is allowed to go through or not, without being confronted to additional superfluous information. If this additional information exists it can be more confusing than descriptive and can create difficulties and misinterpretations.

Safety implications

11. The fact that this information for the driver is more obvious and clear increases safety.

Feasibility

12. This proposal does not present any problems of implementation nor negative consequences. It would permit an easier implementation for drivers and traffic managers and also more easy work by the enforcement authorities namely the police.
