

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Bern, 25-28 March 2008

Item 5 (b) of the provisional agenda

Proposals for Amendment to RID/ADR/ADN

Comments on paper INF.4 (Finland)

Transmitted by the Government of the United Kingdom

1. The expert from Finland rightly points out the apparent anomaly in including 1.4S explosives in the High Consequence Dangerous Goods list (Table 1.10.5) when the disapplication of the security provisions offered by the provisions of 1.1.3.6.2 permits the transport of unlimited quantities of such articles and substances without the application of the provisions of Chapter 1.10.

2. When the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods agreed with the proposal from the expert from the United Kingdom to add specific Class 1 explosives of Division 1.4 to the High Consequence Dangerous Goods list in Chapter 1.4 of the Model Regulations, it was on the basis that any quantity of such explosives posed a serious security risk. The only disapplication offered in the Model Regulations, additional to the quantity limitations set out in Table 1.4.1 (shown as 'bulk' or 'non-bulk') is that for dangerous goods packed in limited quantities (3.4.1). It is the contention of the government of the United Kingdom, therefore, that no exemption from security provisions for any quantity of the UN numbers specified under Division 1.4 should be offered in RID/ADR/ADN. That is to say that if only one detonator of a specified UN number is transported, so attractive are these articles to potential terrorists that it should be subject to the full security provisions.

3. In order to achieve this aim, the United Kingdom suggests that the wording of 1.1.3.6.2 should be amended as follows:

1.1.3.6.2 Where the quantity of dangerous goods carried on a transport unit does not exceed the values indicated in column (3) of the table in 1.1.3.6.3 for a given transport category (when the dangerous goods carried in the transport unit belong to the same category) or the value calculated in accordance with 1.1.3.6.4 (when the dangerous goods carried in the transport unit belong to different transport categories), they may be carried in packages in one transport unit without application of the following provisions:

- Chapter 1.10 **except for Class 1 explosives of Division 1.4;**
- Chapter 5.3;
- Section 5.4.3;
- Chapter 7.2, except for V5 and V8 of 7.2.4;
- CV1 of 7.5.11;
- Part 8 except for 8.1.2.1 (a),
8.1.4.2 to 8.1.4.5,
8.2.3,
8.3.3,
8.3.4,
8.3.5,
Chapter 8.4,
S1(3) and (6),
S2(1),
S4 and
S14 to S21 of Chapter 8.5;
- Part 9;

***NOTE:** For the information in the transport document see 5.4.1.1.10.*

4. It should be recognised, however, that similar articles that are assigned to Class 1, Division 1.1 are currently exempted in the 2007 RID/ADR/ADN Agreements from the security provisions when 20 kg or less are transported, since these are assigned to Transport Category 1. Logically, the same provisions should apply both to Division 1.1 and 1.4 detonators, shaped charges etc. The view of the United Kingdom is that such articles in Division 1.1 should also be subject to the full security provisions irrespective of the quantity transported. No proposal is made at this time to align the requirements for both Division 1.1 and 1.4 at this time since both the European Commission and the United Kingdom are currently conducting studies on the appropriateness of the current RID/ADR/ADN security provisions. In addition, the UNECE ITC has now instructed WP.15 to also review the appropriateness of Chapter 1.10. The United Kingdom would propose to await the outcome of these studies before making amendments to Chapter 1.10 other than that proposed above to address the anomaly identified by Finland.
