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**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods  
(Seventy-eighth session, agenda item 6,  
Geneva, 9-13 May 2005)

**PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR**

**Transport of fireworks UN-NO.0336**

**Clarification in Chapter 3.3 SP 651**

**Transmitted by the Government of Austria**

**Introduction**

At its seventy-third session, the Working Group decided to insert SP 651 in Chapter 3.3 of ADR as proposed by the International Federation of Freight Forwarders Association (FIATA) in TRANS/WP.15/2002/22. It reads “The Special Provision V2 (1) is only applicable for a net explosive content of more than 3000 kg (4000 kg with trailer).“

This wording causes problems concerning trailers, as it neither clearly indicates a certain partition of the load nor how to treat semi-trailers.

**Proposal**

Replace the text of SP 651 by the following:

“The Special Provision V2 (1) is only applicable for a net explosive content of more than 3000 kg per vehicle and 4000 kg per transport unit.“

**Justification**

The proposed wording reduces the possible interpretations to a single one, which Austria considers to be the correct one. It does not lead to any other change. Both carriers and enforcement authorities will benefit from a text stating clearly and unambiguously its meaning.

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