Mixed loading prohibition in 7.5.2.1 of RID/ADR

Transmitted by the Government of Sweden\(^1,2\)

Introduction

1. Packages bearing different labels shall not be loaded together in the same vehicle or container unless mixed loading is permitted according to the provisions of sub-section 7.5.2.1 in RID/ADR.

2. Table note d in the table of sub-section 7.5.2.1 states that mixed loading is permitted between blasting explosives and ammonium nitrate (UN Nos. 1942 and 2067) and other substances provided the aggregate is treated as blasting explosives under Class 1 for the purposes of placarding, segregation, stowage and maximum permissible load.

3. During blasting activities in Sweden, UN 3375 AMMONIUM NITRATE EMULSION or SUSPENSION or GEL, which has nearly the same characteristics as UN 1942 and UN 2067, is commonly used. Mixed loading of UN 3375 and blasting explosives is already permitted on Mobile Explosives Manufacturing Units (MEMUs) according to the provisions laid down in sub-section 4.7.1 of ADR, but not in packages according to sub-section 7.5.2.1.

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\(^1\) In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

\(^2\) Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2012/17.
4. The Government of Sweden is therefore of the opinion that UN 3375 should be treated in the same way as UN 1942 and UN 2067, and that mixed loading of packages containing UN 3375 and blasting explosives should be permitted. However, the load should still be treated as blasting explosives in Class 1.

5. If the Joint meeting agrees, Sweden would like to include UN 3375 in table noted in the mixed loading provisions of sub-section 7.5.2.1.

Proposal

6. Add “and ammonium nitrate emulsion or suspension or gel (UN 3375)” in footnote d to sub-section 7.5.2.1 as follows (new text underlined)

*d Mixed loading permitted between blasting explosives (except UN No. 0083 explosive, blasting, type C) and ammonium nitrate (UN Nos. 1942 and 2067) and ammonium nitrate emulsion or suspension or gel (UN 3375) and alkali metal nitrates and alkaline earth metal nitrates provided the aggregate is treated as blasting explosives under Class 1 for the purposes of placarding, segregation, stowage and maximum permissible load. Alkali metal nitrates include caesium nitrate (UN 1451), lithium nitrate (UN 2722), potassium nitrate (UN 1486), rubidium nitrate (UN 1477) and sodium nitrate (UN 1498). Alkaline earth metal nitrates include barium nitrate (UN 1446), beryllium nitrate (UN 2464), calcium nitrate (UN 1454), magnesium nitrate (UN 1474) and strontium nitrate (UN 1507).“.

Justification

7. Safety will not be compromised since the proposed mixed loading should be treated as blasting explosives in Class 1 and could also be compared to other already permitted mixed loadings.

8. Mixed loading of UN 3375 and blasting explosives are already permitted in the provisions for Mobile Explosives Manufacturing Units (MEMUs) in sub-section 4.7.1 of ADR.

9. The proposed mixed loading will also lead to less number of transports than if they would have been carried out separately.