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## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

100th session

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Item 4 of the provisional agenda

Interpretation of ADR

2 May 2016

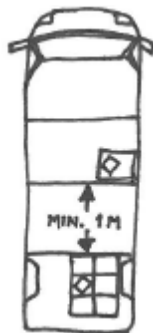
### Comments on INF.5 (The meaning of “no danger” in the note to 7.5.2.2 in ADR)

#### Transmitted by the Government of Finland

1. In INF.5, Sweden states that there is not 100 % safe system that would fulfil the requirement “there shall be **no danger** of transmission of detonation” in every condition. We agree with Sweden on this issue.

2. Finland would like to inform the following. In our legislation, we have an addition to 7.5.2.2 footnote a) which reads:

“The following is regarded as an acceptable method of segregation which do not require separate approval: Maximum of 500 items of UN 0029, 0030, 0255, 0267 detonators and UN 0360, 0361 detonator assemblies may be loaded together with UN 0081, 0082, 0083, 0084, 0241, 0331, 0332 blasting explosives provided that detonators and detonator assemblies are kept at least 1 meter apart from blasting explosives by complete partition walls made of at least 1 cm thick sheet of form plywood [marine plywood] or equivalent material. The maximum explosive content shall be 300 kg.”



3. These detonators and blasting explosives are the ones that are commonly used. And during the time of above mentioned national regulation (about 20 years) we have not noticed that this wouldn't be an adequate way of segregation.

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