Exemptions related to the nature of the transport operation

Transmitted by the Government of Sweden

According to 1.1.3.1 (c) carriage undertaken by enterprises which is ancillary to their main activity, in quantities of not more than 450 litres per packaging and within the maximum quantities specified in 1.1.3.6, is exempted from the provisions in ADR and RID. However, these exemptions do not apply to Class 7. The quantities for explosives specified in 1.1.3.6 are 50 kg net weight for e.g. UN 0081 Explosive, Blasting with classification code 1.1D and 20 kg net weight for detonators with classification code 1.1B.

This means that carriage of explosives to a blasting operation can be performed with e.g., 40 kg net weight of UN 0081 Explosive, Blasting together with 3500 detonators and still benefit from the exemption in 1.1.3.1 (c) without fulfilling any other of the provisions in ADR or RID e.g. packing requirements, requirements for segregation of articles of compatibility group D and articles of compatibility group B, and in ADR only, requirements on fire extinguishers. Nor does the security provisions in Chapter 1.10 apply.

In Annex I to directive 2008/68/EC one can find that at least one Member State has regulated this kind of transport.

The delegate from Sweden is of the opinion that this is an undesirable situation that needs to be regulated and wants to hear views from other delegations.