

## **Economic Commission for Europe**

### **Inland Transport Committee**

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

**108th session**

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Item 6 of the provisional agenda

**Interpretation**

**5 November 2020**

### **Comments on INF.9 from Norway – Interpretation of the amended 8.5 S1 (6)**

**Transmitted by the Government of Sweden**

#### **Introduction**

Sweden would like to thank Norway for their document concerning carriage in accordance with sub-section 1.1.3.6 and the additional requirement S1 (6) in Chapter 8.5. Sweden agrees with Norway's interpretation, that for goods subject to sub-section 1.1.3.6, supervision shall be carried out in accordance with Chapter 8.4 but need not be supervised in accordance with S1 (6) in Chapter 8.5.

#### **Discussion/question**

Sweden is of the opinion that the provisions in sub-section 1.1.3.6 are not very clear or easy to follow. E.g. 1.1.3.6.2 states that Chapter 1.10 is not applicable except for certain UN-numbers. Furthermore, only some of the provisions in Part 8 must be applied, such as Chapter 8.4 and many of the additional requirements in Chapter 8.5 (among these, S1(6)).

At the same time, 1.1.3.6 only requires training in accordance with Chapter 1.3. Apart from the provisions on drivers training in Chapter 8.2 (which are not applicable), security training is only required in Chapter 1.10. However, when neither Chapter 1.10, nor sections 8.2.1 and 8.2.2 are applicable, nothing ensures that the driver has any knowledge about the security provisions or the additional requirements in Chapter 8.5. We find this situation, which is not new, contradictive.

The only UN-numbers that are covered by the provisions in Chapter 1.10 when carried in accordance with sub-section 1.1.3.6 are those specifically listed under the first indent in 1.1.3.6.2. Thus, these are the only UN-numbers where training that also covers security-awareness in accordance with Chapter 1.10 would be required.

Sweden are of the opinion that the provisions in sub-section 1.1.3.6 need to be reviewed. In the meanwhile, to solve the problem of interpretation raised in Norway's document, a temporary solution could be to add further UN-numbers to the list in the first indent under sub-section 1.1.3.6.2.

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