
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

108th session

21 October 2020

Geneva, 10-13 November 2020

Item 6 of the provisional agenda

Interpretation of ADR

Interpretation of the amended 8.5 S1 (6)

Transmitted by the Government of Norway

Summary

Related document: ECE/TRANS/WP.15/249

Introduction

Norway have noticed that 8.5 S1 (6) have been amended for ADR 2021. The amendment introduces a connection between the provisions for supervision in chapter 8.5 and the security provisions in chapter 1.10 and Norway think that this is a step forward. However, did the amendment at the same time introduce less stringent provisions for "small loads" (goods subject to 1.1.3.6)? We differ on the interpretation of this and therefore ask WP.15 for advice.

Question

We would like to know if the working party will agree to the following interpretation:

A vehicle is transporting packages of UN 0082 EXPLOSIVE, BLASTING, TYPE B and no other dangerous goods. The net mass of the explosive substance on the transport unit is 49 kg. According to 8.5 S1 (6) the following provisions apply:

ADR 2019: The requirements of chapter 8.4 apply. In addition, the explosives shall be supervised at all times in order to prevent any malicious act and to alert the driver and the competent authorities in the event of loss or fire.

ADR 2021: The requirement of chapter 8.4 apply. However, the explosives need not to be supervised at all times in order to prevent any malicious act and to alert the driver and the competent authorities in the event of loss or fire, because according to 1.1.3.6 this transport is not subject to 1.10.3 and is not required to have a security plan described in 1.10.3.2.
