

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Any other business

Discrepancies between high consequence dangerous goods, Table 1.10.3.1.2, in relation to Chapter 8.5, S1 (6) and sub-section 1.1.3.6

Transmitted by the Governments of Sweden and Norway

Introduction

1. Sweden and Norway have examined the provisions in chapter 1.10, and especially the divisions of Class 1 listed as high consequence dangerous goods in Table 1.10.3.1.2.
2. The aim with this exercise was to compare explosives in the divisions of Class 1 listed as high consequence dangerous goods with the additional requirement on supervision in S1(6), chapter 8.5. A comparison has also been made with sub-section 1.1.3.6 and the possibility to carry high consequence dangerous goods in accordance with 1.1.3.6, without having to apply chapter 1.10.
3. Chapter 1.10 was introduced in ADR 2005, and we think it is time to take a closer look at the scope of these provisions together with the scope of sub-section 1.1.3.6. There is a gap between the security obligations for transport and non-transport activities. For instance, while ADR exempts carriage in accordance with 1.1.3.6, the restrictions are more stringent for such small loads when handled at e.g. construction sites.
4. Thus, it seems that the provisions and exemptions in ADR are not in line with the security threats we face today.
5. Recent incidents in Sweden have involved class 1 products, with thefts from both closed and sheeted vehicles. In Norway, we also struggle with security breaches in the form of thefts, often committed by employees carrying out transportation to construction sites.

Background

6. The examination has shown that there are 205 explosives in a division listed as high consequence dangerous goods from 0 kg but still allowed for carriage in accordance with 1.1.3.6 and thus exempted from the provisions in chapter 1.10. We have listed these explosives in Annex 1 to this document.
7. Further, we have found a discrepancy of 128 explosives when comparing Table 1.10.3.1.2 with S1(6) in chapter 8.5, see Annex 2.
8. In order to achieve harmonization, these explosives should be evaluated, and either included as high consequence dangerous goods or removed from the additional provision on supervision in S1(6). These substances are listed in Annex 2 to this document.
9. In 2005, at the 28th session of the Sub-committee on experts on the Transport of Dangerous Goods, United Kingdom presented a document [ST/SG/AC.10/C.3/2005/39](#) concerning security and addition to the high consequence dangerous goods indicative list, stating a still valid point:

“There are ranges of explosives articles that are classified as Division 1.1, but in different packaging arrangements may be classified as Division 1.4. Of particular concern are detonators, detonating cords and shaped charges. The exclusion of such articles of Division 1.4 means that, for the same article, a security plan may or may not be required, simply depending on how it is packaged.”

10. Around 2015 the question was raised again by several countries at the Sub-committee on experts on the Transport of Dangerous Goods. The discussions during those meetings showed that it was a large support to revise the list of substances in the table. However, for different reasons the work did not continue.

Discussion

11. Hence, we have some questions open for comments:

(a) Should the list of high consequence dangerous goods in section 1.10.3 be reviewed?

(b) Should substances listed as high consequence dangerous goods from 0 kg, but which nevertheless may be carried in accordance with sub-section 1.1.3.6 be reconsidered?

(c) Should the exemption from all security provisions in 1.1.3.6 be limited to section 1.10.3 for Class 1? Such an amendment would mean that the general security provisions (1.10.1) and security training (1.10.2) would apply for all explosives.

The current listed UN numbers in class 1 not exempted at all would remain unchanged.

(d) Would it be reasonable to fully harmonize the provisions concerning supervision in special provision S1(6), with the list of high consequence dangerous goods?
