



---

**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods****110th session**

Geneva, 8–12 November 2021

Item 5 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:  
miscellaneous proposals****Requirements on security for dangerous goods carried in  
accordance with 1.1.3.6****Transmitted by the Governments of Sweden and Norway\*****Introduction**

1. At the 109<sup>th</sup> session of the Working Party, Norway and Sweden submitted informal document INF.8. The document presented the discrepancies between the security provisions in Chapter 1.10 and the provisions in Chapter 8.5, S1 (6) and sub-section 1.1.3.6 respectively. This document is a follow up on basis of the discussions from the last meeting, with focus on 1.1.3.6.
2. There are 212 Class 1 substances and articles listed as high consequence dangerous goods in packages (Table 1.10.3.1.2) from 0 kg, which may be carried in accordance with sub-section 1.1.3.6 without having to apply any of the provisions concerning security in chapter 1.10.
3. In addition, there are 318 substances and articles belonging to other classes which are also listed as high consequence dangerous goods but permitted to be carried in accordance with 1.1.3.6. These are toxic gases, desensitized explosives in Class 3 and Class 4.1 and toxic substances of packing group I. We have listed all the concerned substances and articles, including those in Class 1, in informal document INF.3.
4. We think that it is inconsistent that goods specifically considered as high consequence dangerous goods from 0 kg are exempted from the provisions of Chapter 1.10 when carried in accordance with sub-section 1.1.3.6. This is relevant for all classes, but in particular for explosives of Class 1. In our countries there are no similar security exemptions in other regulations for storage, handling and use of explosives.
5. To increase the security level for transport in accordance with 1.1.3.6, Sweden and Norway propose that the security provisions should apply to all substances and articles that are included in Table 1.10.3.1.2.

---

\* A/75/6 (Sect.20), para 20.51.

6. If the proposal (alternative 1 or 2 below) would be adopted, consequential amendments would be needed in section 1.10.4.

7. In 1.10.4 we propose to delete the first sentence; if 1.1.3.6 is applied for carriage of substances or articles exempted from Chapter 1.10, section 1.10.4 is no longer applicable. If the transport contains substances or articles which are not exempted from Chapter 1.10, this is already stated in the first indent in 1.1.3.6.2. Thus, the first sentence in 1.10.4 only repeats what is already clarified in 1.1.3.6.

8. Furthermore, we also propose to delete the second sentence in 1.10.4 concerning exemptions from Chapter 1.10 for bulk and tank carriage. Irrespective of the volume contained, for carriage in bulk or tank, transport units bear orange coloured plates and are usually also marked with placards, or labels for some smaller volumes. Thus, a would-be perpetrator might in many cases not be able to determine whether the transport carries a full load or only contain a smaller volume, when the security threat could remain the same.

9. Furthermore, distribution of dangerous goods in bulk and tank is not allowed in accordance with 1.1.3.6 or in application of any other exemption in section 1.1.3. Therefore, it seems inconsistent to allow for an exemption which refers to the quantities specified in 1.1.3.6.

## Proposals

### Alternative 1

10. Amend the first indent in 1.1.3.6.2 as follows (added text underlined, deleted text strikethrough):

“- Chapter 1.10 except for high consequence dangerous goods (according to subsection 1.10.3.1) ~~Class 1 explosives of UN Nos. 0029, 0030, 0059, 0065, 0073, 0104, 0237, 0255, 0267, 0288, 0289, 0290, 0360, 0361, 0364, 0365, 0366, 0439, 0440, 0441, 0455, 0456, 0500, 0512 and 0513~~ and except for Class 7 excepted packages of UN Nos. 2910 and 2911 if the activity level exceeds the A<sub>2</sub> value;”

### Alternative 2

11. In case the proposal above would not be adopted, we propose a second alternative which only deals with amendments covering class 1.

Amend the first indent in 1.1.3.6.2 as follows (added text underlined, deleted text strikethrough):

“- Chapter 1.10 except for high consequence dangerous goods of Class 1 explosives (according to subsection 1.10.3.1) of UN Nos. 0029, 0030, 0059, 0065, 0073, 0104, 0237, 0255, 0267, 0288, 0289, 0290, 0360, 0361, 0364, 0365, 0366, 0439, 0440, 0441, 0455, 0456, 0500, 0512 and 0513 and except for Class 7 excepted packages of UN Nos. 2910 and 2911 if the activity level exceeds the A<sub>2</sub> value;”

### Consequential amendment (alternatives 1 and 2)

*Comment: The second sentence is proposed to be deleted but is kept within square brackets for separate consideration.*

12. Amend section 1.10.4 to read as follows (changes underlined or stricken through):

~~In accordance with the provisions of 1.1.3.6, the requirements of 1.10.1, 1.10.2, 1.10.3 and 8.1.2.1 (d) do not apply when the quantities carried in packages on a transport unit do not exceed those referred to in 1.1.3.6.3, except for UN Nos. 0029, 0030, 0059, 0065, 0073, 0104, 0237, 0255, 0267, 0288, 0289, 0290, 0360, 0361, 0364, 0365, 0366, 0439, 0440, 0441, 0455, 0456, 0500, 0512 and 0513 and except for UN Nos. 2910 and 2911 if the activity level~~

---

~~exceeds the  $A_2$  value (see first indent of 1.1.3.6.2). In addition, [†The requirements of 1.10.1, 1.10.2, 1.10.3 and 8.1.2.1 (d) do not apply when the quantities carried in tanks or in bulk on a transport unit do not exceed those referred to in 1.1.3.6.3./The requirements of 1.10.1, 1.10.2, 1.10.3 and 8.1.2.1 (d) do not apply when the quantities carried in tanks or in bulk on a transport unit do not exceed those referred to in 1.1.3.6.3.]~~

~~In addition †The provisions of this Chapter do not apply to the carriage of UN No. 2912 RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-I) and UN No. 2913 RADIOACTIVE MATERIAL, SURFACE CONTAMINATED OBJECTS (SCO-I).~~

## **Justification**

13. Except for specific UN-numbers, sub-section 1.1.3.6 exempts application of chapter 1.10. Thus, when goods are carried in accordance with 1.1.3.6, training is only required in accordance with chapter 1.3, but with exemption from the last sentence in 1.3.1 which addresses security training. This, and the exemption from the other security provisions in chapter 1.10, gives improper signals concerning the security risks connected to high consequence dangerous goods. Introducing requirements on security would promote the security awareness and increase the safety of the driver.