

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

111th session

Geneva, 9 - 13 May 2022

10 March 2022

Item 5 (b) of the provisional agenda

Proposals for amendments to annexes A and B of ADR: miscellaneous proposals

Transport Security

Transmitted by the Government of Sweden

1. For several years, Sweden has raised issues relating to increased security for transport of dangerous goods. The background to our concerns has been provided during previous meetings and in documents to the Working Party, the majority prepared and submitted in co-operation with Norway.
2. In dialogue with actors who handle explosive substances and articles of Class 1, it has been stated that the threat of theft during ongoing transports is perceived as unacceptably high.
3. On the basis of this document, we would like to hear your views on introducing additional provisions in ADR with the aim to strengthen the physical protection of transport.

Closed EX/II vehicles?

4. Currently, it is possible to carry quite large amounts of theft-attractive goods of Class 1 in sheeted EX/II vehicles. Due to the increasing number of security incidents, the explosives' industry and the Swedish police have expressed the opinion that such goods always should be carried in closed vehicles. We share their concerns and believe that the security should be strengthened.
5. Would it be appropriate to require that substances and articles belonging to Class 1, listed as high consequence dangerous goods in Chapter 1.10, always should be carried in closed vehicles? As a result, the requirement on locking of vehicle in S1(7) would apply.

Minimum security level for locks?

6. The additional provisions in S1(7) requires that:

“Doors and rigid covers in the load compartments on EX/II vehicles and all openings in the load compartments of EX/III vehicles carrying substances and articles of Class 1 shall be locked during transport, except for the periods of loading and unloading.”

7. In our view, this requirement is vague and may in practice be met by using any kind of lock. In order for the provision to fulfil its function, i.e. to protect against theft or misuse, we believe it would be appropriate to introduce a minimum requirement for the locks used, and would appreciate your views on this matter.

Alarm for protection of the load?

8. Subsection 1.10.3.3 states the following:

“Devices, equipment or arrangements to prevent the theft of the vehicle carrying high consequence dangerous goods (see Table 1.10.3.1.2) or high consequence radioactive material (see 1.10.3.1.3) and

its cargo, shall be applied and measures taken to ensure that these are operational and effective at all times. The application of these protective measures shall not jeopardize emergency response.”

9. What is meant by “devices, equipment or arrangements”? Is an alarm required or can this requirement be met in alternative ways, and if so, how?
