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**AGGREGATION OF EXPLOSIVES OF HAZARD DIVISION 1.4 COMPATIBILITY  
GROUP S WHEN CARRIED WITH EXPLOSIVES OF OTHER HAZARD DIVISIONS**

**Transmitted by the Government of the United Kingdom**

<i>Executive summary:</i>	This proposal seeks to remove Division 1.4 compatibility group S substances and articles from Class 1 mixed load calculations.
<i>Action to be taken:</i>	To amend section 6.5.8.4 (special requirement) SR83 of Rev.5 [Marginal 11 402]
<i>Related documents:</i>	Brief comparison to UN Recommendations, RID and the IMDG Code. These documents are not needed to assess this proposal.

**Introduction**

Section 6.5.8.4 SR83 of Rev 5 [similar to existing Marginal 11 402] states:

“Where substances and articles are loaded on one transport unit in conformity with the prohibitions of mixed loading contained in SR82 [11 403], the load as a whole shall be treated as if it belonged to the most dangerous division (in the order 1.1, 1.5, 1.2, 1.3, 1.6, 1.4)”.

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This text makes no specific reference to compatibility groups and must therefore include them all. Thus even explosives of classification code 1.4S must be aggregated and deemed to be in the highest division carried.

This rule is over-severe, because, by definition, the 1.4S explosives do not contribute to the hazard posed by explosives belonging to other divisions when loaded with them. It is not sensible to treat them as if they do.

Also, there is no precedent for this requirement in the UN Recommendations. Similarly, although RID and IMDG Code apply the same order of hazard as ADR, neither impose limitations on explosive quantities which may be carried. It is suggested that ADR is overly restrictive and a simple change could solve this problem.

### **Proposal**

It is proposed that the following sentence is added to 6.5.8.4 SR83 [or at the end of Marginal 11 402]: “However the net mass of explosives of compatibility group S (46° & 47°) shall not count towards the limitation of quantities carried”.

### **Justification**

**Safety:** This proposal recognises the relatively safe nature of explosives of classification code 1.4S and simply proposes that it is illogical to consider them as more dangerous explosives when transported with other divisions of explosives.

Thus present safety standards are maintained.

**Feasibility:** Companies which transport explosives, particularly for military operations are most likely to benefit from this proposal.

The present safety standards will be maintained, but there will be some operational benefits for industry. In some cases the total number of journeys will be reduced, with associated reductions in risks.

No transition period will be required.

**Enforceability:** Once implemented the changes will be as easy to enforce as the existing requirements.

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