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ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

<u>Joint Meeting of the RID Safety Committee and the</u> <u>Working Party on the Transport of Dangerous Goods</u> (Geneva, 13-17 September 2004)

Comments on document 2004/23 from FIATA

Transmitted by the Government of Norway

	SUMMARY
Executive Summary:	Document TRANS/WP.15/AC.10/2004/23 from FIATA propoes to delete SP 617 which contains a requirement for the addition of the technical names for explosives for the generic UN Nos. 0081, 0082, 0083, 0084, 0241, 0331 and 0332.
Action to be taken:	Revise the proposal from FIATA to only include the deletion of the technical name from the transport document.
Related documents:	TRANS/WP.15/AC.10/2004/23.

1. Introduction

Document TRANS/WP.15/AC.10/2004/23 from FIATA asks for a deletion of SP617. Norway does not agree with FIATA that the text of SP 617 can be fully deleted.

2. <u>Proposal</u>

Norway proposes to change the proposal from FIATA into:

Delete the last part of SP 617, so that it will read: "In addition to the type of explosive, the commercial name of the particular explosive shall be marked on the package."

3. <u>Justification</u>

Norway does not fully support the rationale for deleting SP617 as given in the document from FIATA. We can understand that the need for adding the technical name on the transport document is cumbersome for the industri, and adds very little of value for the emergency services and for roadside controls.

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We do not agree with the rationale that one for reasons of security shall delet the technical name. Any authorized person that is on the lookout for explosives will get enough information from the proper shipping name to suit his purpose. The "technical names" used for blasting explosives covered by the UN Nos. in question will not mean much anyway to an uninitiated, exept maybe for the word "Dynamite" that are used in some countries.

For users of blasting explosives though, the "technical name" will mean a lot, in particular for safety reasons when using the explosive due to variations in "strength" within one and the same type of explosive, and will normally also be required by national explosives legislation to be printed on the packagings anyway. For reasons of harmonisation, it would be preferable to leave this requirement as is in the RID/ADR.
