DANGEROUS GOODS PANEL (DGP) WORKING GROUP MEETING (DGP-WG/16)

Montreal, 17 to 21 October 2016

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions* for the Safe Transport of Dangerous Goods by Air (Doc 9284) for incorporation in the 2019-2020 Edition

2.7: Part 7 — Operator's Responsibilities

SEPARATION OF EXPLOSIVES

(Presented by B. Carrara)

SUMMARY

This working paper invites the DGP-WG to consider proposed changes to the provisions for separation of explosive substances and articles in Part 7;2.2.2 of the Technical Instructions.

Action by the DGP-WG: The DGP-WG is invited to amend the Technical Instructions as shown in the appendix to this working paper.

1. **INTRODUCTION**

- 1.1 Part 7;2.2.2.4 of the Technical Instructions presents the following provision for explosives:
 - "2.2.2.4 Except as provided for in 2.2.2.5, explosives of different compatibility groups may be stowed together whether or not they belong to the same division."
- 1.2 Although not related to the same document, the Supplement contains an additional table (Table S-7-1) with separation requirements for explosives, which contradicts the information in Part 7;2.2.4 of the Technical Instructions, since it presents some restrictions for the stowage of explosives of different compatibility groups.
- 1.3 Although applicable to special situations of transport, the information in Table S-7-1 when compared to that presented by 7;2.2.4 might cause confusion to States or operators involved in the transport of explosives under an exemption, for example.

- 1.4 Furthermore, the text in 7.1.3.1.2 (c) of the UN Model Regulations also contradicts the text in the Technical Instructions.
 - "7.1.3.1.2 Goods in Compatibility Groups A to K and N may be transported in accordance with the following provisions:

. . .

- (c) Packages bearing different compatibility group letters shall not in general be transported together (regardless of the division number) except in the case of compatibility group letters C, D, E and S as explained in 7.1.3.1.3 and 7.1.3.1.4."
- 1.5 Besides contradictory, the text in Part 7;2.2.2.4 might be considered unnecessary given that it adds no different information to that provided in 7;2.2.2.5. The application of 7;2.2.2.5 and, consequently, the application of Table 7-2 by itself is enough to ensure compliance with explosive separation requirements in situations of transport of permitted explosive substances or articles.
- 1.6 Thus, this working paper proposes the deletion of current paragraph 2.2.2.4 of Part 7 and the consequential changes to the following paragraph.

2. **ACTION BY THE DGP-WG**

2.1 The DGP-WG is invited to amend the Technical Instructions as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 7 OF THE TECHNICAL INSTRUCTIONS

Part 7

OPERATOR'S RESPONSIBILITIES

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Chapter 2

STORAGE AND LOADING

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2.2 INCOMPATIBLE DANGEROUS GOODS

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2.2.2 Separation of explosive substances and articles

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2.2.2.4 Except as provided for in 2.2.2.5, explosives of different compatibility groups may be stowed together whether or not they belong to the same division.

2.2.2.52.2.2.4 For explosives of different division numbers and compatibility groups, the segregation scheme shown in Table 7-2 must be followed in order to maintain acceptable distances between such packages.

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