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INLAND TRANSPORT COMMITTEE

Working Party on the transport of Dangerous Goods

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Comments to the document ECE/TRANS/WP.15/2008/4 15 February 2008 about
Mobile Explosives Manufacturing Units (MEMUs)
Transmitted by the Government of Spain

SUMMARY

Executive Summary: The definition of MEMU and the application field of the measures contained in the mentioned document have to be very precise and exempt of any doubts to assure its application by the Authorities of the Contracting Parties in a clear and homogeneous way. The definition of MEMUs must include a clarification, due to the fact that the ADR application field includes the unloading and specially because in the case of MEMUs unloading means “manufacturing of explosives”. Such clarification is included on the point 1.2.1 of the document, but in the official definition (Annex 2 Part 1 Chapter 1.2, foot note point 1.2.1) this clarification is in brackets.

Action to be taken: Remove the brackets in the definition of MEMU (Annex 2 Part 1 Chapter 1.2, foot note point 1.2.1)

Related documents: ECE/TRANS/WP.15/2008/4 15 February 2008

Background

The document submitted by the MEMUs Working Group includes a MEMU definition in the point 1.2.1, clarifying the exclusion of the manufacturing of explosives in the mixing equipments or in the loading of boreholes.

Taking into account that the unloading process is included in the ADR transport definition, and due to the fact that, in the case of MEMUs, unloading means the process of manufacturing explosives, the MEMUs Working Group considered that a clarification was needed to avoid misunderstandings. Such clarification was included by the Working Group in the way of a foot note (see Annex 2 Part 1 chapter 1.2 point 1.2.1). Nevertheless this foot note appears now in brackets.

Proposal

Remove the brackets in the foot note of the definition of MEMUs (Annex 2 Part 1 Chapter 1.2.1).
