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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the
Transport of Dangerous Goods

Thirty-fifth session
Geneva, 22–26 June 2009
Item 2 of the provisional agenda

EXPLOSIVES AND RELATED MATTERS

Information required on the Dangerous Goods Transport document when transporting fireworks

Transmitted by the experts from Germany and the United Kingdom¹

Introduction

1. The majority of fireworks transported around the world are now classified using the procedure set down in 2.1.3.5.2 of the Model Regulations. Although not specifically stated as a requirement in the Model Regulations some competent authorities require an application to be made for classification leading to the issue of a uniquely identifiable document. If not for transport purposes, this is usually necessary for importation, storage and use reasons.
2. In European land transport regulations, ADR, special provision SP 645 was amended to take account of the major accidents involving fireworks in Enschede, Netherlands in 2000 and in Kolding, Denmark in 2004. This provision required the classification code for fireworks to be

¹ In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118(a) and ST/SG/AC.10/36, para. 14)

used only with the approval of the competent authority prior to carriage. In addition a second requirement has been inserted at 5.4.1.2.1(g) of ADR in that it requires the transport document to bear the inscription "Classification recognized by the competent authority of .."

Discussion

3. During the past four years there have been many tens of thousands of shipments of fireworks arriving at ports in Europe for onward distribution by road. Hamburg and Felixstowe have seen a number of containers of fireworks where the transport documentation had been marked with the wording required by ADR 5.4.1.2.1 but checks made by the authorities prior to the unloading of the vessels found that the fireworks had either not been classified at all or had been labelled inappropriately with the lowest hazard (1.4G) whilst actually classifiable with a higher hazard. The enforcement authorities at these ports had to arrange for these fireworks to be correctly classified before they could be delivered to the final destination. Classification of the fireworks was carried out by European competent authorities and many of the fireworks that were declared as 1.4G or 1.3G were subsequently classified to a higher classification (1.3G, 1.2G or 1.1G).

4. The Hamburg Water Guard have details of over 5,000 containers of fireworks that arrive at that port every year and about 10% of these containers are detained because the declarations were false. Examples of some of fireworks that arrived at Hamburg in the first half of 2008 are shown in the annex.

5. Containers of fireworks whose contents are not properly classified also arrive each year at ports in the United Kingdom. One particular shipment was not classified and could also not be assessed under the default system because the firework details were not available. The shipping line agreed to destroy the fireworks at a cost to them of over £100,000. In other cases the fireworks containers were sent to a licensed explosives site and treated as Division 1.1 until the fireworks could be classified properly.

6. These illegal importations of fireworks result in enforcement agencies having to deal with problems that should not occur. This results in delays to the vessels' journeys, disruption to port operations, additional work for enforcement agencies and competent authorities, and significant costs to the importer/carrier. More importantly there are real safety concerns where the hazard of the fireworks is not correctly identified.

7. Most competent authorities issue classification assignment documents with a unique reference number for each firework and many of these are available in searchable databases available on the internet. By including these firework classification reference numbers in the dangerous goods transport document, it should give those involved in the transport of fireworks evidence that the classification assignment is correct. This should help to ensure that unclassified fireworks cannot be transported.

8. Most containers of fireworks have under 8 tonnes gross of fireworks with between 5 and 20 different firework products. The additional classification information proposed below should not impose much additional work for the consignor of the fireworks.

9. The experts from Germany and the United Kingdom believe that a similar paragraph to that found in ADR should be inserted in part 5 of the Model Regulations to ensure that the transport documentation bears a statement that the classification of fireworks have been agreed by the competent authority and appropriate classification reference numbers are assigned. This should ensure traceability of the classifications, improve modal harmony and reduce the risk of fire works being undeclared or misdeclared. They therefore propose the following;

Proposal

10. Amend 5.4.1.6 to include a new paragraph

"5.4.1.6.2 When fireworks of UN Nos 0333, 0334, 0335 and 0336 are transported, the transport document shall include a certification that the goods are properly classified. The text for this certification is "Classification of fireworks by the competent authority of ZZ with the classification reference number(s) XX/YYYY"

where ZZ is the name of the country assigning the classification code, XX is the distinguishing sign for motor vehicles in international traffic and YYYY is the unique classification reference number issued by that country's competent authority.

11. Renumber existing 5.4.1.6.2 as 5.4.1.6.3.

Annex

No of containers	Arrival of vessel/ check of documents	Result of plausibility check	Certificate according to SP 645	Certificate according to SP 645 submitted on	Fireworks declared as	Classification of the articles in accordance with certificate under SP 645
3	05.12.2007	deficiencies	not yet applied for	15.4.2008	1.4G 0336	1.2G 0334
1	05.12.2007	deficiencies	not yet applied for	22.1.2008	1.4G 0336	1.3G 0335
2	09.12.2007	deficiencies	not yet applied for	15.4.2008	1.4G 0336	1.2G 0334
3	09.12.2007	deficiencies	not yet applied for	22.5.2008	1.4G 0336	1.1G 0333
1	06.01.2008	deficiencies	not yet applied for	06.2.2008	1.4G 0336	1.2G 0334
1	10.01.2008	no objection	applied for	15.1.2008	1.4G 0336	1.4G 0336
1	08.03.2008	no objection	requested	11.3.2008	1.4G 0336	1.4G 0336
1	15.03.2008	no objection	applied for	31.3.2008	1.3G 0335	1.3G 0335
1	06.04.2008	deficiencies	not yet applied for	02.6.2008	1.4G 0336	1.1G 0333
1	24.04.2008	no objection	applied for	30.4.2008	1.4G 0336	1.4G 0336
1	25.04.2008	deficiencies	not yet applied for	3.6.2008	1.4G 0336	1.3G 0335