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**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

**Working Party on the Transport  
of Dangerous Goods**  
(Seventy-third session,  
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**PROPOSAL OF AMENDMENTS TO ANNEXES A AND B OF ADR**

**TRANSPORT OF FIREWORKS UN-NO. 0336**

**SUB-SECTION 7.5.5.2.1 - CHAPTER 3.2 - SECTION 3.3.1**

**Transmitted by the International Federation of Freight Forwarders Associations (FIATA)**

**1. Introduction**

According to the text in force for limitations of the quantities carried in the 1997 edition of the ADR, the transport of fireworks UN-No. 0336 up to 3000 kg net explosive content (NEC) (4000 kg NEC with trailer) in a former Type I vehicle (marginal 11 401, \*-reference) was permitted. After the deletion of the former Type I vehicle and the introduction of the requirements for B.3 certificates for EX/II vehicles in 1999, the freight forwarding business together with the pyrotechnics industry had experienced severe problems in transporting these goods. The transport capacity of the fleet of EX/II and EX/III vehicles in some countries is not sufficient to cope with the seasonal demand.

**2. Proposal**

Insertion of a footnote "b" in the table of subsection 7.5.5.2.1, in line "EX/II", in column "1.4" at "15000" as follows:

Transport Unit	Division	1.1		1.2	1.3	1.4		1.5 and 1.6	Empty uncleaned packagings
	Compatibility group	1.1A	Other than 1.1A			Other than 1.4S	1.4S		
EX/II a)		6.25	1 000	3 000	5 000	15 000 <b>b)</b>	Unlimited	5 000	Unlimited
EX/III a)		18.75	16 000	16 000	16 000	16 000	Unlimited	16 000	Unlimited

a) For the description of EX/II and EX/III vehicles see Part 9.

**b)** For UN-No. 0336 an EX/II-vehicle is necessary for more than 3000 kg net explosive content (4000 kg with trailer)

Establish the new Special Provision “XXX” in section 3.3.1 as follows:

“The Special Provision V2 (1) is only applicable for a net explosive content of more than 3000 kg (4000 kg with trailer).“

Insertation of this Special Provision “XXX” in the Dangerous Goods List of chapter 3.2, line “0336”, column 6.

### 3. Justification

According to the present regulations of the ADR of subsection 1.1.3.6.3. it is allowed to transport fireworks under UN No. 0336 up to 333 kg NEC by Diesel truck (former means of transport Type I).

Due to some national legal explosive regulations (e.g. Germany), it is necessary to distribute all fireworks (UN-No’s 0337 and 0336 only) for New Year’s Eve in a very short time frame. This is impossible with the a.m. restriction of capacity for Diesel trucks, the former Type I vehicles (more than 180,000 consignments have to be transported to more than 100,000 sales branches only in Germany from October to December). Neither the pyrotechnical industry **nor** their freight forwarding agents have nearly a sufficient number of vehicles of EX/II and EX/III at their disposal. The automobile industry is also not in a position to deliver such a great number of EX/II and EX/III vehicles.

Furthermore, the probability of accidents during the transportation of fireworks of UN No. 0336 on Diesel trucks (former Type I) is to be estimated as extremely low. Concerning the differences in the requirements of vehicles of the former Type I and of the EX/II vehicles – for example, the conditions regarding the motor, exhaust system, tank and driver’s cabin – there cannot be seen any risks for fireworks of UN-No. 0336. This has also been confirmed through experts reports of the German Federal Institute for Materials Research and Testing (BAM).

Finally the former text of the ADR 1997 in 11 401 allowing the following exception:

**\*) Nr. 0336: 3.000 kg (4.000 kg with trailer)**

would have certainly not entered into the ADR in 1997, if problems had existed in connection with safety.

