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Regd. No. 17903

ALL INDIA LOCO RUNNING STAFF ASSOCIATION

CENTRAL ZONE

6/208, Pink City, Near Royal Park, Ambarnath (E), Thane MH, 421501.

R. P. Gedam
Zonal President
Mob : 9503114310

H. B. SINGH
Zonal Treasurer
Mob : 9004442686
ailsamumbai@gmail.com

R. K. SHARMA
Zonal Secretary
Mob : 8097169215
ramkumar185102@gmail.com

Letter No.: AILRSA/CR/GS/DETONATORS/2026

Date : 22.10.2026

To,

1. The General Manager

Central Railway, (CSMT), Mumbai.

2. The Principal Chief Security Commissioner (PCSC)

Railway Protection Force (RPF),
Central Railway, CSMT, Mumbai.

3. The Director General of Police / Additional Director General of Police (Railways)

Government of Maharashtra,
In-charge of Government Railway Police (GRP), Maharashtra.

Subject :- FORMAL COMPLAINT-CUM-LEGAL REPRESENTATION AND ADVANCE NOTICE REGARDING THE FORCED PERSONAL CARRIAGE, TRANSPORTATION AND RETENTION OF DETONATORS BY LOCO RUNNING STAFF—SERIOUS CONCERNS REGARDING STATUTORY COMPLIANCE, PASSENGER SAFETY, EMPLOYEE SAFETY AND ARTICLE 21 OF THE CONSTITUTION OF INDIA.

Reference:

1. Railway Board Letter No. **TC-II/2077/04/1 dated 17.08.2004**, regarding restrictions on the carriage of explosives and inflammable articles in trains.
2. The provisions of the Explosives Act, 1884, and the Explosives Rules, 2008, as applicable to the custody, handling and transportation of detonators.
3. Article 21 of the Constitution of India, guaranteeing protection of life and personal liberty.

Respected Sir(s),

On behalf of the **All India Loco Running Staff Association (AILRSA)**, Central Railway, the undersigned submits this formal complaint-cum-legal representation to bring to your immediate attention a serious safety and legal concern arising from the practice of requiring Loco Running Staff to personally carry detonators during railway duty, including situations involving travel in passenger trains, movement through public areas and retention of such material during rest at Running Rooms/Rest Rooms.

The issue directly concerns the safety of railway employees, passengers and the general public, as well as the lawful handling, custody and transportation of explosive material.

This representation is being submitted not merely as a request for administrative reconsideration, but also as a **formal record of the Association's safety objections, request for statutory scrutiny and advance notice against any retaliatory or disciplinary action arising from a bona fide safety concern.**

1. Railway Board's Instructions Dated 17.08.2004 Require Serious Consideration

Railway Board, vide Letter No. TC-II/2077/04/1 dated 17.08.2004, issued instructions concerning restrictions on the carriage of explosives and inflammable articles in trains.

The said communication referred to Rules 505 and 506 of IRCA Coaching Tariff No. 25 and emphasised strict enforcement of the applicable restrictions concerning the carriage of explosives and other dangerous articles in passenger trains and compartments.

The letter also referred to the need to prevent fire-related incidents and directed Zonal Railways to ensure strict implementation of the applicable rules.

In view of these instructions, the Association seeks a clear and reasoned determination of the legal and administrative authority under which Loco Running Staff are presently required to carry detonators personally, particularly when such carriage involves passenger coaches or other areas occupied by members of the public.

The Association respectfully submits that the aforesaid Railway Board letter must be read together with the applicable statutory provisions and any specific, valid exceptions or authorisations governing the carriage of detonators.

A general operational requirement cannot, by itself, be treated as sufficient justification for disregarding applicable statutory restrictions or prescribed safety conditions.

2. Detonators Are Explosive Articles Requiring Appropriate Safety Controls

Detonators are not ordinary railway tools or articles of personal luggage. They are explosive articles whose handling, custody and transportation must be assessed under the applicable explosives legislation and safety procedures.

The Explosives Act, 1884, and the Explosives Rules, 2008, provide the statutory framework governing explosives, including relevant requirements and restrictions concerning their transportation and handling.

The Association does not dispute the legitimate operational requirement for railway safety equipment where such equipment is lawfully prescribed. However, the existence of an operational requirement does not automatically establish that every method of carrying or retaining such material is lawful, safe or authorised.

Accordingly, the Railway Administration must clarify:

1. The precise statutory provision, Railway Board instruction or competent-authority order authorising the personal carriage of detonators by Loco Running Staff.
2. The applicable conditions governing the quantity, packaging, custody, movement and transportation of such detonators.
3. Whether the proposed method of carriage complies with the applicable restrictions relating to passenger and mixed trains.
4. Whether any prescribed authorisation, certification, documentation or special handling procedure is required and, if so, how compliance is ensured.
5. The designated responsibility for safe custody, loss prevention, accounting, return and reporting of detonators.

Unless these matters are examined and clarified, requiring individual employees to personally carry explosive material raises a legitimate and serious safety concern.

3. Forced Carriage in Passenger Coaches and Among Passengers

The Association has received serious concerns regarding the requirement imposed upon Loco Running Staff to carry detonators while travelling in passenger trains or coaches and moving among ordinary passengers.

This practice raises an important question: **What specific statutory provision or valid authorisation permits the particular method of transportation currently being imposed upon the employees?**

The Association requests an examination of whether the existing practice complies with the applicable provisions of the Explosives Act, 1884, the Explosives Rules, 2008, the Railway Board's instructions dated 17.08.2004 and other relevant safety requirements.

The Association emphasises that it is not seeking an exemption from legitimate railway safety duties. It seeks only to ensure that the discharge of such duties takes place through a legally authorised, properly controlled and demonstrably safe procedure.

The safety of passengers and employees cannot be left dependent upon an informal operational arrangement without verification of its legal authority and safety safeguards.

4. Retention of Detonators in Running Rooms/Rest Rooms During Rest Periods

A further serious concern arises where Loco Running Staff are required to retain detonators in their personal custody while staying or resting at Running Rooms/Rest Rooms.

Such premises are used by multiple railway employees for rest and recovery. Requiring an employee to retain explosive material during a common rest period raises questions regarding secure storage, access control, accountability and emergency response.

The Railway Administration is therefore requested to establish:

- Whether the relevant Running Room/Rest Room has been authorised or approved for the storage or temporary custody of the particular explosive articles, wherever such authorisation is legally required.
- Whether a designated secure storage arrangement is available.
- Whether the prescribed custody, handover, receipt and return procedures are followed.
- Who bears official responsibility for the safe custody of the detonators during the employee's rest period.
- What procedure applies in the event of loss, theft, accidental damage or any other safety incident.

The Association submits that employees should not be placed in a position where they are expected to personally assume responsibility for the custody of explosive material during rest without clear instructions, appropriate safeguards and a lawful, documented allocation of responsibility.

5. Article 21 of the Constitution of India: Protection of Life and Personal Safety

Article 21 of the Constitution of India protects life and personal liberty. The protection of life necessarily requires serious consideration of credible risks to personal safety.

Loco Running Staff perform safety-critical duties under demanding operational conditions. Their responsibilities do not extinguish their right to raise genuine safety concerns or to seek clarification regarding the legality of an instruction that exposes them to a potential hazard.

The Association therefore submits that an employee's bona fide request for verification of the applicable rules, safe custody arrangements and legal authorisation for personally carrying detonators must not automatically be construed as wilful disobedience or misconduct.

Where an employee expresses a genuine inability or safety objection to personally carrying detonators under circumstances that appear inconsistent with the applicable rules or prescribed safeguards, the matter must be examined objectively by the competent authority.

The Administration is requested to provide a clear, written and legally sustainable procedure for the issue, transportation, custody and return of detonators, so that neither employees nor passengers are exposed to avoidable risks.

The right to life and personal safety cannot be reduced to a mere administrative formality. Equally, the Association recognises that the legality of any particular instruction must be assessed in light of the applicable statutory provisions, authorised exceptions and the specific facts of the case.

6. Formal Advance Notice Regarding Possible Disciplinary Action

The Association considers it necessary to place the following position formally on record.

If any Loco Running Staff member, acting bona fide and on a genuine safety-related basis, expresses inability or raises a reasoned objection to personally carrying detonators because of concerns regarding statutory compliance, passenger safety, secure custody or personal safety under Article 21 of the Constitution, the competent authority should first examine the objection and provide a reasoned clarification of the applicable rules and authorised procedure.

If, despite the present representation, any disciplinary proceedings, charge memorandum, show-cause notice, adverse service entry, punishment or other retaliatory action is initiated against an employee **merely for raising such a bona fide safety objection or seeking compliance with the applicable law**, the Association reserves the right to rely upon this representation and its acknowledged receipt as contemporaneous documentary evidence.

This document is being submitted in advance so that the Railway Administration and the concerned security and police authorities are formally placed on notice of the safety concerns, the request for clarification and the need for a lawful, reasoned response.

In any subsequent departmental proceedings or appropriate judicial proceedings, including proceedings before the Central Administrative Tribunal or another competent forum, the Association may produce this representation, together with its acknowledgement, relevant instructions and supporting records, to demonstrate that the safety concerns had been raised in advance and that the authorities had been given an opportunity to examine the matter.

The Association further reserves the right to challenge any action that is found to be arbitrary, retaliatory, procedurally unfair or contrary to applicable law.

This advance notice is not intended to authorise an indiscriminate refusal of lawful duties. It is intended to ensure that a genuine safety objection is not automatically treated as misconduct without examining the applicable law, the facts, the employee's explanation and the prescribed procedure.

7. Specific Reliefs and Action Requested

In view of the seriousness of the matter, AILRSA requests the following:

A. Immediate safety and legal review :- A joint or coordinated examination by the competent departments of Central Railway, RPF and GRP, within their respective jurisdictions, of the existing practice of requiring Loco Running Staff to personally carry detonators.

B. Production of the governing instructions :- A certified copy of the Railway Board circular, departmental order, safety instruction or other competent-authority approval under which the present procedure has been prescribed.

C. Verification of statutory compliance :- A written determination of whether the existing method of carrying, transporting and retaining detonators complies with the applicable provisions of the Explosives Act, 1884, the Explosives Rules, 2008, the Railway Board's letter dated 17.08.2004 and other applicable instructions.

D. Examination of passenger-train carriage :- Specific scrutiny of the practice of carrying detonators in passenger coaches or among passengers, including verification of any applicable statutory exception, prescribed conditions or competent-authority authorisation.

E. Examination of Running Room/Rest Room custody :- An immediate review of the arrangements under which detonators are retained during rest periods, including storage, custody, access control, handover, return and accountability.

F. Interim safety arrangements :- Pending the above review, the Administration should consider appropriate interim arrangements to prevent unsafe or unauthorised personal carriage or retention of detonators and ensure that any carriage that is legally required is undertaken only through an authorised procedure satisfying all applicable conditions.

G. Protection against retaliatory action :- A written direction to the concerned authorities that bona fide safety concerns must be assessed objectively and that no employee should be subjected to arbitrary or retaliatory disciplinary action merely for raising such concerns or seeking clarification of the applicable statutory requirements.

H. Written response and time-bound disposal :- A reasoned written response addressing the issues raised in this representation, along with details of the corrective measures proposed or implemented.

8. Responsibility of the Competent Authorities

The General Manager, Central Railway, is requested to ensure that the matter is examined at the appropriate administrative and safety levels.

The Principal Chief Security Commissioner, RPF, is requested to examine the security implications, insofar as they fall within the jurisdiction and responsibilities of the Railway Protection Force.

The Director General of Police/Additional Director General of Police (Railways), Maharashtra, is requested to consider the complaint within the jurisdiction of the Government Railway Police and take such action as may be warranted under the applicable law.

The Association requests that the matter not be dismissed as a routine operational issue without examining the statutory framework and the actual circumstances of carriage and custody.

9. Final Submission and Reservation of Rights

AILRSA reiterates that it is committed to railway safety, passenger safety and the lawful discharge of the duties of Loco Running Staff.

The Association does not seek to obstruct legitimate railway operations. Its concern is that operational duties must be performed within the boundaries of applicable law and prescribed safety procedures, without exposing employees or passengers to avoidable risks or placing individual employees under unclear and potentially unreasonable responsibility for explosive material.

The Railway Board's letter dated 17.08.2004, the applicable explosives legislation and the constitutional protection of life and personal safety warrant a careful, documented and reasoned examination of this issue.

This representation shall therefore be treated as:

1. A **formal safety and legal complaint**;
2. A request for verification of statutory and administrative authorisation;
3. An advance record of the Association's bona fide safety objections; and
4. A formal notice that the Association reserves its right to place this document and the response, or failure to respond, on record before the appropriate departmental, statutory or judicial forum, wherever legally relevant.

The Association requests acknowledgement of receipt and a reasoned written response at the earliest.

Yours faithfully,


(Com. R. K. SHARMA) 22/10/26

GENERAL SECRETARY

All India Loco Running Staff Association (AILRSA)

Central Railway

Date : 22.10.2026

Place : Mumbai