



**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****Forty-first session**

Geneva, 25 June – 4 July 2012

Item 2 (f) of the provisional agenda

Explosives and related matters: miscellaneous**IBCs for transporting UN 3375 Ammonium Nitrate
Emulsion, Suspension or Gel****Transmitted by the Australian Explosives Industry Safety Group
(AEISG)¹****Introduction**

1. The current packing instructions in the Model Regulations for UN 3375 (AMMONIUM NITRATE EMULSION or SUSPENSION or GEL, intermediate for blasting explosives) are P099 and IBC99:

“Only (packagings or IBCs) which are approved by the competent authority for these goods may be used (see 4.1.3.7). A copy of the competent authority approval shall accompany each consignment or the transport document shall include an indication that the packaging was approved by the competent authority.”

2. AEISG is aware that competent authority approval has been issued from Malaysia to permit the transport of UN 3375 from Malaysia to Hong Kong, China, in 31HA1 Intermediate Bulk Containers (IBCs) and that transport by this means has proceeded safely and without mishap for some time.

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

3. AEISG is also aware that competent authority approval has been issued in Germany to permit UN 3375 to be transported in:
 - IBCs of types 11H1, 11A, 31A, 11HA1 and 31HA1 (IBC 11A and 31A are approved only if fitted with safety valves); and
 - Plastics drums with removable head (type 1H2).
4. Type 31HA1 IBCs have been used widely across Australia for several years to safely transport UN 3375 within mines (not on public roads).
5. The Sub-Committee will also be aware that blasting explosives (UN Nos. 0082, 0241, 0331 and 0332) are permitted to be transported according to packing instructions P116 and IBC100. This creates the completely anomalous position whereby UN 3375 may not be transported in packagings or IBCs without specific Competent Authority approval yet the blasting explosives that are generated by sensitising UN 3375 may be carried in a wide variety of packagings and IBCs. This is particularly anomalous when the sensitisation process may be as simple as adding glass microballoons.
6. AEISG can see no practical or safety justification for the requirement for competent authority approval for the packagings used for UN 3375

Proposal

7. In view of the above, AEISG proposes the following amendments to the Dangerous Goods List in Chapter 3.2:
 - (a) Column 8 (Packing Instructions) for the entry for UN 3375: to delete P099 and IBC99 and substitute P116 and IBC100.
 - (b) Column 9 (Special Packing Provisions) for the entry for UN 3375: add PP61, PP62 and PP65.
8. Consequential amendment:

UN 3375 should be added to the list of UN numbers in PP61, PP62 and PP65, and in IBC100 in Chapter 4.1.
