Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Sub-Committee of Experts on the Transport of Dangerous Goods

Forty-eight session

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Explosives and related matters: miscellaneous

Comments on document ST/SG/AC.10/C.3/2015/47 Explosives excluded from the high consequence dangerous goods list in Chapter 1.4

Transmitted by the expert from Sweden

Introduction

- 1. At the forty-seventh session, Sweden proposed in informal document INF.38 (47th session) to include further explosives in the indicative list of high consequence dangerous goods in Chapter 1.4 of the UN Recommendations. The reasoning behind the proposal was that some explosives in the list may be excluded from the current security provisions when packaged differently, since packing measures might result in a less stringent classification for the concerned explosives.
- 2. Italy raised a similar issue at the 45th and 47th sessions in documents ST/SG/AC.10/C.3/2014/86 and informal document INF.47 (47th session). The same problem has also been high-lighted earlier by the United Kingdom in document ST/SG/AC.10/C.3/2005/39, where a number of explosives classified in Division 1.4 were added to the list in Chapter 1.4.

Discussion

- 3. For the forty-eighth session, the expert from the United Kingdom has submitted document ST/SG/AC.10/C.3/2015/47 concerning all n.o.s. entries in Division 1.4. Based on the same concerns regarding re-classification due to different packing measures, the United Kingdom is proposing that the competent authority must specify whether security provisions should be applied for these explosives or not.
- 4. The expert from Sweden believes that the proposal from the United Kingdom is a step in the right direction and supports the initiative. Nevertheless, Sweden still has concerns that security measures could be avoided for several other highly attractive explosives, when different packing measures are being used that result in a milder classification.

- 5. With reference to these arguments and to paragraphs 18 20 in the report from the 47th session (ST/SG/AC.10/C.3/94), Sweden would like to discuss the possibility to include additional explosive articles under specific UN numbers in Division 1.4 in the list of high consequence dangerous goods in Chapter 1.4.
- 6. The table below indicates the articles that, in our view, contain explosives identified as potential candidates for misuse and the possibility to create mass destruction or casualties, but due to packing procedures are not covered by the high consequence list and the security measures in Chapter 1.4.

	High Consequence		Non-High Consequence due to packing	
Proper Shipping Name	UN No	Hazard Code	UN No	Hazard Code
CARTRIDGES, POWER DEVICE	0381	1.2C	0276 0323	1.4C 1.4S
CARTRIDGES, POWER DEVICE	0275	1.3C	0276 0323	1.4C 1.4S
CARTRIDGES, OIL WELL	0277	1.3C	0278	1.4S
CHARGES, EXPLOSIVE, COMMERCIAL	0442	1.1D	0444	1.4D
			0445	1.4S
CHARGES, EXPLOSIVE, COMMERCIAL	0443	1.2D	0444	1.4D
			0445	1.4S
CHARGES, BURSTING, PLASTICS BONDED	0457	1.1D	0459	1.4D
			0460	1.4S
CHARGES, BURSTING, PLASTICS BONDED	0458	1.2D	0459	1.4D
			0460	1.4S
CHARGES, PROPELLING	0271	1.1C	0491	1.4C
CHARGES, PROPELLING	0415	1.2C	0491	1.4C
CHARGES, PROPELLING	0272	1.3C	0491	1.4C

^{7.} In summary, it is the explosive content, not the packing measures that are crucial for the potential of misuse in a terrorist action or other criminal activities.

Proposal for discussion

8. Add the following UN Numbers to the indicative list of high consequence dangerous goods in Table 1.4.1 of the UN Model Regulations: UN 0276, 0278, 0323, 0444, 0445, 0459, 0460 and 0491.