

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

21 November 2016

Fiftieth session

Geneva, 28 November-6 December 2016

Item 2 (b) of the provisional agenda

**Recommendations made by the Sub-Committee
on its forty-seventh, forty-eighth and forty-ninth sessions
and pending issues: explosives and related matters**

Application of Security Provisions to Explosives N.O.S

Final consideration concerning proposal by Italy

Transmitted by the expert from Italy

Summary

Executive summary:	Classification of explosives: assigning 1.4S Classification code
Action to be taken:	Proposal to add two new UN entries and to amend UN0349 and UN0481
Reference documents:	ST/SG/AC.10/C.3/2014/22 (Italy) and informal document INF.61 (Report Working Group on Explosives) (<u>45th session of the Sub-Committee</u>); ST/SG/AC.10/C.3/2014/86 (Italy) and informal document INF.47(Italy), informal document INF53 (Report Working Group on Explosives) (<u>47th session of the Sub-Committee</u>); Informal document INF.44(Italy), informal document INF53 (Report Working Group on Explosives), ST/SG/AC.10/C.3/96 (<u>Report of the 48th session of the Sub-Committee</u>).
Related documents:	--

Introduction and discussion

1. At the 45th session (June 2014) of the Sub-Committee, Italy described a problem concerning the inconsistency of paragraph 2.1.2.1.1 of the Model Regulations on the Transport of Dangerous Goods while it states that the 1.4S classification code can be assigned in case of:

“ Substances or items packed in such a way as to confine any dangerous explosive effect, caused by an accidental operation, within the package itself, therefore those items or materials can be assigned the 1.4S classification code.”

2. The EWG recognizing the problem, discussed the proposal presented by the expert of Italy taking into account also the views and alternative solutions proposed by other experts.

3. After long discussions during the 48th session, the EWG presented two options as possible solution (see par. 13 of the report informal document INF.53 (48th session)); the Sub-Committee noted the preference expressed by most experts for option 2 of the proposal by EWG, that involves the redrafting of both the definition of “*high consequence*” and the “*list of high consequence dangerous goods*”, using the form of a framework, taking into account also the concept of “security sensitive” dangerous goods.

(Excerpt from page 8 of the report doc ST/SG/AC.10/C.3/96)

22. *For the issue of the application of security provisions to N.O.S. entries for explosives, as described in paragraph 13 of the report, most experts who took the floor said that they preferred the option 2 proposed. However some delegations feared that defining “high consequence” dangerous goods as “security sensitive” dangerous goods might complicate the current situation in the sense that competent authorities might have to be consulted frequently including for classes other than Class 1. They would prefer an intermediate solution that would retain the current system of identifying in the Model Regulations those dangerous goods which are deemed to be high-consequence dangerous goods, but would also, for example, associate a quantity factor in the case of explosives of Division 1.4. The expert from the United Kingdom said that he intended to submit a new proposal for the next session.*

4. Italy fully support option 2 but also shares the fear expressed by some delegations during the discussion regarding the complexity and the length of that process that might complicate the current situation.

For these reasons Italy wants to confirm the validity of the solution as proposed in the document 48/INF.44 (for ease of reading the proposed amendments of the Model Regulations are listed in Annex I) which can also be considered as a temporary solution pending the above mentioned activity of redrafting.

Request for a decision

5. Furthermore Italy would like to remind that some request of classification are waiting to be answered by the National Authority.

6. Moreover at time the experts of Italy did not received written comments/suggestions or objections by other experts.

7. Therefore Italy is requesting a final decision by the Sub-Committee on the document ST/SG/AC.10/C.3/2014/86 as modified by UN/SCETDG/48/INF.44.

8. In case of rejection of the proposal, Italy would request that the decision of the Sub-Committee be detailed into the report in order to direct the national activity in a proper way.

Annex

**Excerpt from ST/SG/AC.10/C.3/2014/86 as modified by
UN/SCETDG/48/INF.44**

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Proposal

9. Add two new entries in the dangerous goods list (Chapter 3.2) as follows:
- UN 0XXA SUBSTANCES, EXPLOSIVE, PACKED, N.O.S. 1.4S SP 178,
SP 274, SP 347, SPyyy**
- UN 0XXB ARTICLES, EXPLOSIVE, PACKED, N.O.S. 1.4S SP 178,
SP 274, SP 347, SPyyy**
10. Add a new special provision in Chapter 3.3 as follows:
- SPyyy This entry applies only when the security provisions of Chapter 1.4
have to be fulfilled.**
11. Add to the Table 1.4.1 of Chapter 1.4 against “Class 1, Division 1.4” the new
UN numbers 0XXA and 0XXB
12. Add a new special provision in Chapter 3.3 as follows:
- SPzzz This entry shall not be used when the security provisions of Chapter 1.4
have to be fulfilled.**
13. Add the new SPzzz in Column (6) of the Dangerous Goods List of Chapter 3.2
against UN 0349 and UN 0481.
14. The amendments contained in paragraphs 10 and 12. 14. above have as result in the
Dangerous Goods List the following modifications (new text underlined).

UN No.	Name and description	Class	Sub Sidiary risk	UN packing group	Special provisions	Limited and excepted quantities		Packing instruction
						(7a)	(7b)	
(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)
-	<u>3.1.2</u>	<u>2.0</u>	<u>2.0</u>	<u>2.0.1.3</u>	<u>3.3</u>	<u>3.4</u>	<u>3.5</u>	<u>4.1.4</u>
<u>0XXA</u>	<u>SUBSTANCES, EXPLOSIVE, <u>PACKED</u>, N.O.S.</u>	<u>1.4S</u>	-	-	<u>178</u> <u>274</u> <u>347</u> <u>yyy</u>	<u>0</u>	<u>E0</u>	<u>P101</u>
<u>0XXB</u>	<u>ARTICLES, EXPLOSIVE, <u>PACKED</u>, N.O.S.</u>	<u>1.4S</u>	-	-	<u>178</u> <u>274</u> <u>347</u> <u>yyy</u>	<u>0</u>	<u>E0</u>	<u>P101</u>
0349	ARTICLES, EXPLOSIVE, N.O.S.	1.4S	-	-	178 274 <u>zzz</u>	0	E0	P101
0481	SUBSTANCES, EXPLOSIVE, N.O.S.	1.4S	-	-	178 274 <u>zzz</u>	0	E0	P101