

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

24 June 2019

**Sub-Committee of Experts on the  
Transport of Dangerous Goods**

**Fifty-fifth session**

Geneva, 1-5 July 2019

Item 2 (j) of the provisional agenda

**Explosives and related matters:  
issues related to the definition of explosives**

**Sub-Committee of Experts on the Globally Harmonized  
System of Classification and Labelling of Chemicals**

**Thirty-seventh session**

Geneva, 8-10 July 2019

Item 2 (b) of the provisional agenda

**Classification criteria and related hazard  
communication: review of Chapter 2.1**

**Clarifications to the scope of the class of explosives**

**Transmitted by the Sporting Arms & Ammunition Manufacturers'  
Institute (SAAMI)**

**Introduction**

1. SAAMI wishes to direct the attention of the subcommittees to our proposal to the GHS Sub-Committee, ST/SG/AC.10/C.4/2019/7, related to clarifications to the scope of the GHS class of explosives. That proposal exceeds the scope of the ongoing work on GHS Chapter 2.1 concerning the classification of explosives, as it could impact transport. The SAAMI paper is not intended to be directly attached to the timeline or work outcome of the GHS informal correspondence group (ICG) on this topic. It addresses issue that we believe do exist in the original transport text, which are paralleled in the similar text transposed into GHS.

2. SAAMI acknowledges the parallel work of Sweden on this topic, and appreciates their current papers, informal documents INF.10 (TDG, 55th session), INF.6 (GHS, 37th session) on the transport text. Sweden has provided a comprehensive background, and together with SAAMI's GHS paper ST/SG/AC.10/C.4/2019/7, these papers describe the issues in both the Model Regulations and the GHS.

**Proposal**

3. SAAMI requests that the TDG Sub-Committee review ST/SG/AC.10/C.4/2019/7 in the Explosives Working Group in conjunction with informal documents INF.10 (TDG, 55th session), INF.6 (GHS, 37th session), and offer comments to the TDG and GHS subcommittees. Depending on the results, SAAMI may follow up with a new proposal.

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