

## 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

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### TRANSPORT OF EXPLOSIVES

#### Comments on ST/SG/AC.10/C.3/2006/62

Transmitted by the expert from the United States of America

1. In ST/SG/AC.10/C.3/2006/62 the expert from Canada proposed to add a new 6(d) test, which is the unconfined 6(a) test, to determine explosive effects outside the package for classifying articles into Division 1.4S. This paper is a revision of ST/SG/AC.10/C.3/2005/22 submitted by the expert of Canada to the twenty-seventh session of the UN Sub-Committee of Experts on the Transport of Dangerous Goods in July 2005.
2. Canada made a few major revisions in 2006/62 which include:
  - (1) proposing the 6(d) test as an optional test;
  - (2) proposing that the new test only be used for candidate 1.4S articles or substances which contain detonating explosives or when the classification is packaging-dependent; and
  - (3) proposing that the new test not be used for materials that are inherently classified in Division 1.4S.

The proposal presented in ST/SG/AC.10/C.3/2006/62 is based on limited test results conducted on certain shaped charges. No other examples or data are provided to demonstrate that the current classification criteria prescribed in the UN Test Manual for Division 1.4S articles are inadequate.

3. We do not agree with the interpretation in ST/SG/AC.10/C.3/2006/62 that the classification of articles and substances into Division 1.4S relies solely on the results of the 6(c) test. The expert from the United States of America believes that the combined results of Test Series 4(a), 4(b)(ii), 6(a), 6(b) and 6(c) are sufficient to verify that the effects arising from accidental functioning are confined within any package assigned a Division 1.4S classification. We also disagree with the conclusion (paragraph 6 of 2006/62) that the incident involving a dropped unpackaged shaped charge shows a deficiency in 2.2.4(d). A shaped charge must pass the required 12 meter drop test (test 4(b)(ii)), packaged or unpackaged, before it can be considered for assignment to Class 1. We question how the shaped charge cited in 2006/62 received a Division 1.4S classification.

4. The Sub-Committee will recall that the Committee spent over four years (1995 to 1998) revising the test applicability and criteria for the 6(c) test in the Manual of Tests and Criteria. The Committee developed specific criteria for classifying explosives into various divisions, including criteria for Division 1.4 and further assignment to 1.4S. These criteria are reflected in paragraphs 16.6.1.4.5 and 16.6.1.4.6 of the Test Manual and are not solely based on results from 6(c) test. The expert from the United States believes that the hazardous effects referred to in the note of 2.1.1.4 (d) should be the same effects used to define 1.4S in the 6(c) test. The expert from the United States regards the criteria for 1.4S in the current 6(c) test taken together with criteria that are already included in the 6(a) and 6(b) tests as comprehensive. Furthermore, the competent authority always has the discretion to conduct test 6(a) without confinement.

5. Therefore, we do not support the proposal presented in 2006/62.

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