

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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Item 2 (e) of the provisional agenda

Explosives and related matters: miscellaneous

Harmonized international standard for explosives traceability markings – Comments regarding the scope of the proposal in ST/SG/AC.10/C.3/2014/5

Transmitted by the Institute of Makers of Explosives (IME)

1. IME prepared working paper ST/SG/AC.10/C.3/2014/5 in response to encouragement by the Sub-Committee to do so during discussion of informal document NF.18 at the 43rd session, where it was believed that it might be worthwhile to have a harmonized marking format to assist successful tracing of recovered explosives.
2. In preparing the working paper, IME's intent was to prepare a proposal for harmonization of unique identification of explosive articles when required by national authorities for security of explosives during transport:
 - (a) That harmonized the format of such unique identification marking, if required by a national authority, so that an identification mark will have the same meaning anywhere globally;
 - (b) Whose purpose is to improve security and traceability of explosives during transport, especially for explosives diverted during transport and recovered in a region of different national authority where currently such un-harmonized markings may not have meaning; and
 - (c) Through inclusion in Chapter 1.4 of the Model Regulations, sought to establish an internationally recognized consensus for a harmonized marking format.
3. During discussions of ST/SG/AC.10/C.3/2014/5 at the recent joint IGUS/EPP and Chief Inspectors of Explosives conference and with other experts and industry associations, it has become apparent that what to mark and what not to mark is a potential obstacle to acceptance of the IME proposal in ...C.3/2014/5.
4. The IME proposal in ST/SG/AC.10/C.3/2014/5 is based upon and closely patterned after the format required by European Union Directive 2008/43/EC. That and related directives (Council Directive 93/15/EEC and Commission Directive 2012/4/EU) include within their scope explosives, meaning "...the materials and articles considered to be such in the United Nations recommendations on the transport of dangerous goods and falling within Class 1 of those recommendations, and are placed on the market for civil uses."
5. Additionally, these directives exclude from their scopes the following:
 - (a) explosives, including ammunition, intended for use, in accordance with national law, by the armed forces or the police,
 - (b) Explosives transported and delivered unpackaged or in pump trucks for their direct unloading into the blast-hole,

- (c) Explosives manufactured at the blast sites, and that are loaded immediately after being produced (in situ production),
 - (d) Fuses, which are cord-like non-detonating igniting devices,
 - (e) Safety fuses, which consist of a core of fine grained black powder surrounded by a flexible woven fabric with one or more protective outer coverings and which, when ignited, burn at a predetermined rate without any external explosive effect,
 - (f) Cap-type primers, which consist of a metal or plastic cap containing a small amount of primary explosive mixture that is readily ignited by impact and which serve as igniting elements in small arms cartridges or in percussion primers for propelling charges,
 - (g) Pyrotechnical articles,
 - (h) Ammunition,
 - (i) Explosives articles that are too small to affix the unique identification information otherwise required to be marked or where it is technically impossible due to their shape or design to affix a unique identification, where such unique identification has been affixed on each smallest packaging unit.
6. IME is supportive of limiting the scope of its proposal contained in ...C.3/2014/5 as follows:
- (a) To the same inclusions and exclusions contained in the European Union Directives Council Directive 93/15/EEC and Commission Directives 2008/43/EC and 2012/4/EU, as described in paragraphs 4 and 5 above, and
 - (b) To those explosives deemed appropriate by the TDG sub-committee in consultation with its working group on explosives.
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