
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

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Explosives and related matters

Proposed transition period for the use of new entries for electronic detonators

Transmitted by the Institute of Makers of Explosives (IME)

Introduction

1. The UN Model Regulations now has new UN numbers for electronic detonators. These new numbers have not been incorporated into regulation or other equivalent transport regulatory instruments across all UN member states, although some states are already requiring that the new numbers be used.
2. This non-harmonized approach to implementing the new UN numbers, for an article currently permitted for transport with existing UN numbers, is creating logistical, and therein commercial, issues for industry with no added safety benefit.

Background

3. Prior to the introduction of these new UN numbers, electronic detonators were transported under the description of electric detonators with numbers specified according to the division, namely, for 1.1B, 1.4B and 1.4S; the existing numbers are UN 0030, UN 0255 and UN 0456 (hereafter referred to as “existing UN numbers”). These classifications of electronic detonators prevail and are legitimate means of transport.
4. In 2019 new UN numbers for electronic detonators were introduced, namely UN 0511, UN 0512 and UN 0513 for 1.1B, 1.4B, and 1.4S, respectively. These new numbers will be referred to as “new UN numbers”.
5. The packaging, special provisions, and weight limits are identical for the existing and new UN numbers.
6. In the *Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR)*¹, it is stated in 1.6.1.1 that, “Unless otherwise provided, the substances and articles of ADR may be carried until 30 June 2021 in accordance with the requirements of ADR applicable up to 31 December 2020.”
7. The status is that some EU member states have mandated the use of the new UN numbers, some states continue to recognize the existing UN numbers, and other UN member states have yet to recognize the new UN numbers.

Discussion

8. The disparate application of the new UN numbers poses a logistical challenge for the explosives industry. Manufacturers of electronic detonators in the USA and other UN member states, continue to use the existing UN numbers, whereas some UN member states that import these electronic detonators mandate

¹ ECE/TRANS/300, Applicable as from 1 January 2021

the use of the new UN numbers. A rushed approach in relabeling electronic detonators with new UN numbers is a costly and time-consuming activity with no increase in safety of the transport of the articles.

9. Furthermore, electronic detonators are currently being transported to, between, and within member states with the existing UN numbers. These will require time for the detonators to work through the supply chain. Depending on the member state, these products with the existing UN numbers will be stranded.

10. There is also the potential for electric detonators to be incorrectly relabeled with the new UN numbers for electronic detonators. This can pose a safety concern since electric detonators do not have the inherent safety features of electronic detonators.

Proposal

11. To enable the proper and complete transition of electronic detonators already in the supply chain, and to enable harmonization of the transport regulations among member states since there is inter- and intra-state movement, it is proposed that the Sub-Committee recommend a transition period be extended to 1 July 2026. Further the adoption of the new UN numbers by member states is encouraged to occur as soon as practicable.
