

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

28 November 2022

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Item 2 (b) of the provisional agenda

**Recommendations made by the Sub-Committee at its fifty-eighth,
fifty-ninth and sixtieth sessions and pending issues: explosives and related matters**

Comments on UN/SCETDG/61/INF.6: “Common position on documents ST/SG/AC.10/C.3/2022/63 (China) and ST/SG/AC.10/C.3/2022/58 (Cefic)”

Submitted by the expert from the United Kingdom

Introduction

1. China and Cefic have both submitted proposals (see title of this document) about the assignment of special provision (SP) 28 to existing entries of desensitized explosives in the Dangerous Goods List and following joint discussion both delegations have come to certain conclusion which have been detailed in UN/SCETDG/61/INF.6.
2. This document suggests revisions to the proposals made in UN/SCETDG/61/INF.6 in order to:
 - (a) Simplify the application of SP 28 for persons involved in the transport chain;
 - (b) Simplify enforcement decisions and actions for regulatory authorities
 - (c) Reinforce the importance of ensuring that desensitised explosives must contain an appropriate quantity of diluent if risks are to be properly managed in the transport chain.

Discussion

3. Both delegations appear to agree SP 28 should not apply to UN 2557, 2907, 3319 and 3344 because they appear to have a solid diluent which does not evaporate.
4. There are however additional mechanisms that result in the concentration of a solid diluent falling such as, for example, preferential solvation by water.
5. Whilst these additional mechanisms are only likely to occur where the full safeguards associated with compliance with the Model Regulations have not been complied with, the potential for them to occur and the risks that they could introduce to the transport chain should be recognised and as such SP 28 should be assigned.

Proposal

6. The proposals in documents ST/SG/AC.10/C.3/2022/58 and ST/SG/AC.10/C.3/2022/63 and UN/SCETDG/61/INF.6 are amended as follows:

7. In column 6 of the Dangerous Goods List in 3.2.2:
 - (a) for solid desensitized explosives, assign SP 28 to UN entries 2555, 2556, 2907, 3319 and 3344 i.e., to those entries where a percentage of diluent is either specified or where a minimum percentage of diluent can be inferred from the name and description appearing in column 2 of the Dangerous Goods List;
 - (b) assign SP 28 to the following UN entries of liquid desensitized explosives: UN numbers 1204, 2059, 3064, 3343, and 3357.
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