



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

Sixty-fifth session

Geneva, 25 November–3 December 2024

Item 10 (c) of the provisional agenda

**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals:**

Miscellaneous

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

Forty-seventh session

Geneva, 4–6 December 2024

Item 2 (b) of the provisional agenda

**Work on the Globally Harmonized System of
Classification and Labelling of Chemicals:**

**Work of the Sub-Committee of Experts on the Transport
of Dangerous Goods on matters of interest to the Sub-
Committee of Experts on the Globally Harmonized System
of Classification and Labelling of Chemicals**

Consideration of nitrocellulose mixtures in chapter 2.17 (Desensitized explosives) of the Globally Harmonized System, Section 51 of the Manual of Tests and Criteria and special provision 393 of the Model Regulations

Transmitted by the expert from the United States of America*

I. Background

1. At its forty-sixth session, the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS Sub-Committee) discussed the proposals in ST/SG/AC.10/C.3/2024/24–ST/SG/AC.10/C.4/2024/5 transmitted by the Australian Explosives Industry Safety Group Inc. (AEISG) taking into consideration input from the Explosives Working Group¹ (EWG) and the TDG². The EWG report noted that the current exemption of nitrocellulose mixtures from sensitivity testing in the GHS is too broad and that interested parties would work together with an aim to finding a suitable solution to address the issue within this biennium.

2. This paper gives the GHS Sub-Committee the option to reconsider the proposals outlined by AEISG in ST/SG/AC.10/C.3/2024/24–ST/SG/AC.10/C.4/2024/5 to remove the exemption if agreement is not reached on new proposals to limit the scope of the testing exemption (e.g., ST/SG/AC.10/C.3/2024/69–ST/SG/AC.10/C.4/2024/12). The United States of America remains committed to supporting an effort to develop a more limited scope for

* A/78/6 (Sect. 20), table 20.5.

¹ Report of the Working Group on Explosives TDG/64/INF.67 paragraph 19.

² Work of the Sub-committee of Experts on the TDG on matters of interest to the GHS Sub-committee informal document INF.21 of the forty-sixth session

the nitrocellulose mixture testing exemption and will continue our offer to work with interested parties on this issue.

II. Proposals

A. Amendments to chapter 2.17 of the GHS

3. In paragraph 2.17.2.3, delete the note as follows:

~~“NOTE: Nitrocellulose mixtures containing no explosives other than nitrocellulose, do not need to meet the criterion of 2.17.2.2(b)(ii).”~~

4. In paragraph 2.17.4.1, decision logic 2.17.1, delete footnote 2, as follows:

~~“²Test series 3 is not applicable to nitrocellulose mixtures containing no explosives other than nitrocellulose.”~~

B. Amendments to section 51 of the *Manual of Tests and Criteria*

5. Delete sub-paragraphs 51.3.2 (a) and (c), as follows, and renumber remaining sub-paragraphs accordingly:

~~“(a) Test series 3 may be waived if the explosive itself (i.e. before being phlegmatized) is not too sensitive or thermally unstable in accordance with test series 3;”~~

~~“(c) Test series 3 is not applicable to nitrocellulose mixtures containing no explosives other than nitrocellulose, for which the stability of the nitrocellulose has been established in accordance with appendix 10;”~~

C. Amendments to the *Model Regulations*

6. In chapter 3.3, amend special provision 393 as follows (new text is underlined):

“393 The nitrocellulose shall meet the criteria of the Bergmann-Junk test or methyl violet paper test in the *Manual of Tests and Criteria*, appendix 10. Tests of type 3 (c) need not be applied to the nitrocellulose. However, nitrocellulose mixtures containing plasticisers, pigments, etc. should still undergo type 3(c) testing.”

7. In chapter 3.2, dangerous goods list

Insert special provision “393” in column (6) for UN Nos. 0160, 0161 and 0509 for POWDER, SMOKELESS.

III. Request to the sub-committees

8. The TDG and GHS sub-committees are invited to consider the amendments proposed in paragraphs 3 to 7.
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