

**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals**

30 September 2024

**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 special provision 393 of the Model  
Regulations**

**Transmitted by the expert from the United States of America**

**I. Background**

1. Document ST/SG/AC.10/C.3/2024/93–ST/SG/AC.10/C.4/2024/14 was submitted to reconsider the proposals submitted to the previous sessions of the TDG and GHS sub-committees related to nitrocellulose mixtures. Further consideration should be given to the proposed amendment to special provision (SP) 393 in the *Model Regulations*.
2. It is possible that a more holistic solution that accounts for testing of nitrocellulose in other commodities can be considered. Noting the absence of a session of the Explosives Working Group and further discussion needed on the topic, the United States of America proposes to not assign SP 393 to additional Dangerous Goods List entries at this time; however, we suggest this work be considered in the next biennium.
3. The proposed amendments in paragraphs 6 and 7 of document ST/SG/AC.10/C.3/2024/93–ST/SG/AC.10/C.4/2024/14 are intended to ensure the stability of mixtures containing nitrocellulose be tested in accordance with test series 3 (c). After further review we note the original proposed text may still be misinterpreted by users applying the requirement only to those items listed and not all mixtures. To address this concern revised amendments to SP 393 are proposed to ensure the exception from 3 (c) testing only applies to dry or unmodified nitrocellulose.
4. This document proposes an amendment to replace the proposed text in paragraph 6 and strike paragraph 7 of document ST/SG/AC.10/C.3/2024/93–ST/SG/AC.10/C.4/2024/14. The remaining proposals in these documents should still be considered for incorporation in the *GHS* and *Manual of Tests and Criteria*.

**II. Proposal**

5. Proposed amendment to chapter 3.3 of the *Model Regulations*:  
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 dry or unmodified nitrocellulose.

6. The TDG and GHS sub-committees are invited to consider the amendments as proposed in paragraph 5 above in conjunction with the remaining *GHS* and *Manual of Tests and Criteria* proposals in document ST/SG/AC.10/C.3/2024/93–ST/SG/AC.10/C.4/2024/14.

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