

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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EXPLOSIVES, SELF-REACTIVE SUBSTANCES AND ORGANIC PEROXIDES

Comments to proposed changes to Test series 8 described in ST/SG/AC.10/C.3/2005/14 and -/2005/6

Transmitted by the expert from the United States of America

1. In ST/SG/AC.10/C.3/2005/14 the expert from the United Kingdom proposes to change the wording of the “Yes” box in Test 8(c), Figure 10.4 in the UN Manual or Tests and Criteria. The wording in the “Yes” box was also considered by the informal working group on Ammonium Nitrate Emulsions (ANE), Suspensions and Gels during the meeting held in Madrid on February 14 and 15, 2005. The working group’s proposed changes are described in paragraph 46 of the report of the working group (see ST/SG/AC.10/C.3/2005/6). In both instances, the proposed changes are intended to provide clearer guidance on how to interpret the test results and how to assign a UN number to the tested material.
2. The expert from the United States of America reviewed both of these proposals in detail and concluded that the proposed changes go beyond the intent of Figure 10.4 in several ways:
 - (a) UN 3375 Ammonium Nitrate Emulsion or Suspension or Gel is limited to materials that are “intended to produce a Type E blasting explosive only after further processing prior to use” (see Special Provision 309);
 - (b) The four tests in Test Series 8 (outlined in Figure 10.4) are designed to ensure that materials designated as “intermediate for blasting explosives” do not exhibit explosive properties. Only materials that meet the testing criteria of each of the four tests are allowed to be assigned as Div. 5.1 (UN 3375) materials; and
 - (c) Candidates for UN 3375 are restricted to certain defined compositions. Hazardous properties of these materials are generally known through many years of use.
3. The expert from the United States of America is of the opinion that the current requirements in the UN Model Regulations including the wording in Figure 10.4 are adequate to ensure that materials assigned to UN 3375, after meeting the criteria of Test Series 8, are safe to transport as non- explosives. There is no need to revise the provisions addressing materials that fail Test Series 8. If anything, the wording in the “Yes” box of Test 8(c) could be simplified.

Proposal

4. Revise the text of the “Yes” box of Test 8(c) to be consistent with the wording of the “Yes” box of Test 8(b) to read: “Substance to be considered for inclusion in Class 1”.
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