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 **1 December 2010**

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Transmitted by Australian Explosives Industry Safety Committee (AEISC)

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1. AEISC members would like to see Test Series 8 reviewed in the coming biennium because they are experiencing significant problems with the application of the tests as set out in the Manual of Tests and Criteria.

2. Among the problems AEISC members are experiencing are:

- Inability to source test materials, particularly the steel tubing prescribed in the Manual for the 8 (b) (Gap) test. Coupled with this is inconsistency of interpretation by Competent Authorities. Some will allow the use of equivalent materials, others insist on the use of the exact prescribed materials, regardless of their availability;
- Scarcity of laboratories to perform the tests. There appear to be only three publicly accessible laboratories in the world that can perform the 8 (d) (Vented Pipe) tests;
- Scarcity of facilities to perform the tests. A clear radius of approximately 2 km is needed to perform the 8 (d) test, which also presents a severe fire threat;
- Inconsistencies in test results. These are most apparent for the 8 (c) (Koenen) and 8 (d) test. With mixtures, the orifice in the 8 (c) test can block easily and thus produce false results;
- Inconsistent interpretation of test results by Competent Authorities. AEISC members have had one test report rejected because the temperature of the wood fire in the 8 (d) test dropped below 800° C for a short period during the test. In another case, a Regulator wants the test done as described in the Manual, by starting with the 12mm orifice and reducing diameters, even though the manufacturer knows the material will not fail at a diameter above 2 mm;
- Problems transporting materials from points of manufacture to test laboratories. Members of AEISC who do not have their own test facilities can't legally transport samples to overseas laboratories because the IMDG Code now requires the full suite of Test Series 8 results before any ANE may be transported.

3. AEISC members made a significant contribution to the development of an understanding of the 8 (d) test prior to its adoption and is prepared to actively contribute to the further development of knowledge about the test and its validity.

4. AEISC would like to see at least the following result from the reconsideration of Test Series 8:

- Some guidelines, perhaps in the Guiding Principles, for Competent Authorities to interpret the performance of the test or its results to facilitate the application of some technical expertise rather than literal application of the current text;
- Replacement of the 8 (d) test with something more meaningful;
- A clearer division between the classification issues and issues related to transport in tanks.