



**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****Forty-sixth session**

Geneva, 1 – 9 December 2014

Item 2 (a) of the provisional agenda

**Recommendations made by the Sub-Committee on its forty-third,
forty-fourth and forty-fifth sessions and pending issues: explosives and related matters****Classification of articles under UN No. 0349****Transmitted by the expert from Italy¹***Summary*

Executive summary:	Classification of explosives: assigning 1.4S Classification code
Action to be taken:	Proposal to add two new UN entries and to amend UN0349 and UN0481
Reference documents:	ST/SG/AC.10/C.3/2014/22 (Italy) and INF.61 (Report Working Group on Explosives) (45 th session of the Sub-Committee)

1. At its June session, the Working Group on Explosives discussed document ST/SG/AC.10/C.3/2014/22 from Italy, in which several issues related to the classification process of explosives with 1.4S Classification code, were highlighted:

- (a) The necessity to solve the inconsistency of paragraph 2.1.2.1.1 of the Model Regulations on the Transport of Dangerous Goods while it states that the 1.4S classification code can be assigned in case of:

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

“ Substances or items packed in such a way as to confine any dangerous explosive effect, caused by an accidental operation, within the package itself, therefore those items or materials can be assigned the 1.4S classification code.

when such procedure is applied to N.O.S entries.

(b) As far as concern the applicability of the security provisions (requirements laid down in Chapter 1.4), the necessity to maintain the same conditions applicable to the original items.

During the debate an example was presented related to UN 0349 ARTICLES, EXPLOSIVE, N.O.S with the 1.4S classification code, assigned to items originally classified as UN 0279 CHARGES PROPELLING FOR CANNON, 1.1C but enclosed in an adequate packaging (designed and built with respect of the Test series 6 of the Manual of Tests and Criteria). While UN 0279 shall be subjected to security provisions, UN 0349 is not because it is not mentioned in the Table 1.4.1.

(c) The necessity to find a solution soon because the National Authority received a request of classification in that sense.

2. The Working Group on Explosives concluded the following (excerpt from report: see informal document INF 61):

“The working group recognized and reviewed the problem described in 2014/22 and the proposal to address that problem and observed:

- The issue described is part of a much larger issue in that there are other explosives in Table 1.4.1 of the Model Regulations that, when packaged appropriately, could be classified into Division 1.4 and 1.4S and would no longer be subject to the security provisions of Chapter 1.4. In addition, other explosives classified as Articles, Explosive, n.o.s., could attract security provisions which are not currently specified.
- A possible solution might be to add some security provision(s) to special provision 178.
- Another possible solution might be to provide some guidance in Chapter 1.4 on how to deal with Table 1.4.1 explosives that might drop out because of packaging.

Conclusion: *The working group did not support the proposal by Italy, but did encourage Italy to continue to study the problem and the observations of the working group and develop a more comprehensive proposal for future consideration.”*

3. The expert from Italy would like to reply to the observations of the Working Group as follows:

- The issue would require a more extensive discussion even if the object of the proposal is, and wants to be limited to the request presented by the National Competent Authority waiting for a response. The experts from Italy, however, are available for further discussion on the other issues already mentioned by other experts, aimed at further proposals to be addressed to future sessions of the Sub-Committee.
- On the possibility to add some security provision(s) to the SP178, it can be argued that this would lead to the complicating of the procedure as well as described in the SP178 as part of an “user-friendly” path.
- Regarding the creation of a "guide" related to the application of Table 1.4.1 to be added to Chapter 1.4, it is the opinion of the experts from Italy that the solution is not practicable. In fact the bodies responsible for monitoring the implementation of

the provisions (e.g. road check patrols) do not have complete knowledge of all relevant information relating to the classification, and it is therefore unlikely that they could go back to the original classification of the substance / object because it is not mentioned in the transport document.

4. At the end the expert from Italy considers appropriate to make available to the CA in charge of the process of classification (on the basis of SP178) two pairs of UN numbers: the first pair to be used in case there is the need to apply to the substance/object in the course of classification the security provisions, the second pair of numbers if there is not such necessity.
5. The following detailed proposal for consideration contains the creation of two new entries and the use of the existing UN 0349 and UN 0481, with some modifications in order to align, as much as possible, the contents.

Proposal

6. Add two new entries in the dangerous goods list (Chapter 3.2) as follows:

UN 0XXA SUBSTANCES, EXPLOSIVE, N.O.S. 1.4S	SP 178, SP 274, SP 347,
SPyyy	
UN 0XXB ARTICLES, EXPLOSIVE, N.O.S. 1.4S	SP 178, SP 274, SP 347,
SPyyy	
7. Add a new special provision in Chapter 3.3 as follows:

SPyyy This entry applies only when the security provisions of Chapter 1.4 have to be fulfilled.
8. Add to the Table 1.4.1 of Chapter 1.4 against “Class 1, Division 1.4” the new UN numbers 0XXA and 0XXB
9. Add a new special provision in Chapter 3.3 as follows:

SPzzz This entry shall not be used when the security provisions of Chapter 1.4 have to be fulfilled.
10. Add the new SPzzz in Column (6) of the Dangerous Goods List of Chapter 3.2 against UN 0349 and UN 0481.

Justification

11. Simplification of procedure for the classification and assignment of the UN number.