

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

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**Sub-Committee of Experts on the
Transport of Dangerous Goods**

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Item 2 (e) of the provisional agenda

Explosives and related matters: miscellaneous

**Proposal concerning the format of approvals issued by
Competent Authorities for Class 1 Dangerous Goods**

Transmitted by the expert from the United Kingdom

Introduction

1. As part of the underlying principles of the Model Regulations, competent authorities are charged with ensuring compliance with the Regulations, including the monitoring of the classification of dangerous goods, to ensure the requirements of the Regulations are being met in practice. As part of its role in ensuring that the safety obligations of the various participants in the modal regulations are met, the competent authority for the United Kingdom is often called upon to consider Competent Authority Documents¹ (CAD) produced by a number of competent authorities for the classification of substances and articles in Class 1 (Explosives).

2. At the forty-third session of the Sub-Committee of experts, the expert from the United Kingdom provided the results of a review that had been conducted into the variability of information contained in approvals issued by Competent Authorities when classifying dangerous goods into Class 1². Discussions of the Working Group on Explosives considered the proposals made in the paper and were generally supportive of the principal of defining the minimum information that should be contained in future approvals, although there was some reluctance to specify a defined layout.

3. In the experience of the competent authority for the United Kingdom, the absence of a common format has meant it is sometimes difficult to confirm the hazards presented by explosives during international transport and often hinders the checking of compliance with the original classification. The United Kingdom has also experienced confusion amongst those involved in the transport chain in identifying the classification document amongst the other documents associated with the explosives being carried, such as laboratory test reports.

¹ In this paper the term Competent Authority Documents is used to mean the formal written record of the classification assigned by the relevant competent authority for a particular substance or article in Class 1.

² Informal document INF.11, 43rd session

4. For fireworks assigned a classification using the default table only with the agreement of the competent authority³. In Europe, the requirement for written approval of a competent authority of a Contracting Party to ADR is made explicit⁴ and the unique reference number of that approval must appear on the transport document for any consignment⁵. Making the relevant information easy to identify and readily accessible will assist those involved in the transport operation to comply with these requirements and help regulators in checking compliance with the classification assigned.

5. The principle of a common approach to providing important information relevant to the transport of dangerous goods has been long established in the UN Recommendations in relation to the dangerous goods transport document⁶.

Discussion

6. It is suggested that the purpose of any classification document should be that it:

- Confirms the explosive (whether substance or article) has been assessed by a relevant competent authority;
- Clearly identifies the explosive which is the subject of the classification;
- Clearly assigns the explosive to a UN number, hazard classification and compatibility group;
- Identifies any special conditions that have been taken into account when assigning the classification⁷; and
- Identifies the person or organisation responsible for ensuring compliance with its requirements.

7. It is the opinion of the expert from the United Kingdom that in order for the document to be an effective means of controlling and monitoring the hazards associated with the transport of explosives, it should contain sufficient information to fulfil the above objectives. The essential information that is therefore considered necessary is as follows:

(a) The name of the competent authority and the provisions in national legislation under which it is granted its authority. (*This allows appropriate checks to be made on the validity of the CAD*)

(b) The modal or national regulations to which the CAD is considered to be applicable. (*Different competent authorities in different jurisdictions often have different responsibilities*)

(c) Confirmation that the classification has been approved, made or agreed in accordance with the recommendations of the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods or the relevant modal regulations.

(d) The name and address of the person in law to which the classification has been assigned and any company registration which uniquely identifies a company or other body corporate under national legislation. (*This information allows*

³ UN Model Regulations 2.1.3.5.2

⁴ Special Provision 645 of ADR

⁵ Paragraph 5.4.1.2.1(g) of ADR

⁶ Multimodal Dangerous Goods Form (Figure 5.4.1 of ST/SG/AC.10/Rev.16 (Vol. II))

⁷ Special conditions would include any specific packaging requirements where they are integral to the hazard classification assigned.

appropriate checks and enquiries to be made on the validity of the CAD and the compliance of the various participants with their safety obligations.)

(e) The name under which the explosives will be placed onto the market or otherwise supplied for transport. *(This information allows appropriate checks and enquiries to be made on the classification status of the explosives and the compliance of the various participants with their safety obligations. The name that appears on the CAD should be the same as that appearing on the exterior of any packaging.)*

(f) The Proper Shipping Name, UN number, Class, Hazard Division and corresponding compatibility group of the explosives.

(g) The maximum net explosive mass of the package or article. *(This information allows appropriate checks and enquiries to be made on the classification status of the explosives and the compliance of the various participants with their safety obligations.)*

(h) The name, signature, stamp, seal or other identification of the person authorised by the competent authority to issue the CAD is clearly visible.

(i) Where safety in transport or the hazard division is assessed as being dependant upon the packaging, the packaging mark or a description of the permitted:

- Inner packagings,
- Intermediate packagings
- Outer packagings.

(e.g. for P130 inner packagings – bags plastic; intermediate packagings – none; outer packagings – boxes, fibreboard (4G) or drums, fibre (1G))

(j) The CAD states the part number, stock number or other identifying reference under which the explosives will be placed onto the market or otherwise supplied for transport. *(This information allows appropriate checks and enquiries to be made on the classification status of the explosives and the compliance of the various participants with their safety obligations. The part number etc. that appears on the CAD should be the same as that appearing on the exterior of any packaging.)*

(k) The name and address of the person in law who manufactured the explosives and any company registration which uniquely identifies a company or other body corporate under national legislation *(This information allows appropriate checks and enquiries to be made on the validity of the CAD and the compliance of the various participants with their safety obligations.)*

(l) Any additional information regarding the applicable Packing Instruction and Special Packing Provisions where appropriate. *(This information allows appropriate checks to be made that the correct packaging and packing methods have been used)*

(m) The basis for assigning the classification, i.e. whether on the basis of test results, default for fireworks, analogy with classified explosive, by definition from Dangerous Goods list etc.. *(This information allows appropriate checks and enquiries to be made when validating the explosives compliance with the classification assigned)*

(n) Any special conditions or limitations that the competent authority has identified as relevant to the safety for transport of the explosives, the communication of the hazard and international transport.

(o) The expiry date of the CAD is given where the competent authority considers one to be appropriate.

8. The Working Group on Explosives expressed reluctance to have a specified format for classification documents⁸ and the approach taken for transport documents in Chapter 5.4 of the Model Regulations has been followed as a guide to ensuring recommendations are not taken as obligatory standards and for providing consistency between the two approaches.

Proposal

9. That the text in Annex 1 to this paper be added to Chapter 201 of the Model Regulations.

⁸ UN/SCETDG/43/INF.61/Rev1 paragraph 20

Annex

2.1.3.7 *Form of classification document*

2.1.3.7.1. A Competent Authority assigning an article or substance into Class 1 should confirm with the applicant that classification in writing.

2.1.3.7.2. A Competent Authority classification document may be in any form and may consist of more than one page, provided pages are numbered consecutively. The document should have a unique reference.

2.1.3.7.3. The information provided shall be easy to identify, legible and durable.

2.1.3.7.4. Examples of the information that may be provided in the classification documents are as follows:

- (a) The name of the competent authority and the provisions in national legislation under which it is granted its authority.
- (b) The modal or national regulations for which the classification document is applicable.
- (c) Confirmation that the classification has been approved, made or agreed in accordance with the United Nations Recommendations on the Transport of Dangerous Goods or the relevant modal regulations.
- (d) The name and address of the person in law to which the classification has been assigned and any company registration which uniquely identifies a company or other body corporate under national legislation.
- (e) The name under which the explosives will be placed onto the market or otherwise supplied for transport.
- (f) The Proper Shipping Name, UN number, Class, Hazard Division and corresponding compatibility group of the explosives.
- (g) The maximum net explosive mass of the package or article.
- (h) The name, signature, stamp, seal or other identification of the person authorised by the competent authority to issue the classification document is clearly visible.
- (i) Where safety in transport or the hazard division is assessed as being dependant upon the packaging, the packaging mark or a description of the permitted:
 - Inner packagings,
 - Intermediate packagings
 - Outer packagings.
- (j) The classification document states the part number, stock number or other identifying reference under which the explosives will be placed onto the market or otherwise supplied for transport.
- (k) The name and address of the person in law who manufactured the explosives and any company registration which uniquely identifies a company or other body corporate under national legislation
- (l) Any additional information regarding the applicable Packing Instruction and Special Packing Provisions where appropriate.

(m) The basis for assigning the classification, i.e. whether on the basis of test results, default for fireworks, analogy with classified explosive, by definition from Dangerous Goods list etc..

(n) Any special conditions or limitations that the competent authority has identified as relevant to the safety for transport of the explosives, the communication of the hazard and international transport.

(o) The expiry date of the classification document is given where the competent authority considers one to be appropriate.

2.1.3.7.4. The form shown in Figure 2.1.2 at the end of this chapter is an example of a Competent Authority classification document.

Figure 2.1.2.*Example of Competent Authority classification document for Class 1***Competent authority classification document for Class 1**

1 Competent authority / provisions in national legislation:	Document Reference
2 Modal or national regulations:	
3 Classification approval:	
4 Name and address of approval holder:	
5 Packaging description including inner packagings, intermediate packagings, and outer packagings:	
6 Additional packing instructions or packing method description:	
7 Classification made by test / analogy / definition / default:	
8 Special conditions or limitations:	
	Expiry date of approval
9 Name, signature, stamp, seal of authorising person on behalf of the Competent Authority	
Date of Issue:	

Item No:	Market name of explosives	Proper Shipping Name	UN Number	Division	Packaging requirements (Note 1)	Special Packing (Note 2)	Net explosive mass (kg)	Part /Stock number	Name and address of manufacturer (where different)

- Notes:
1. Packaging mark or relevant description provided in Section 5.
 2. Special packaging provisions provided in Section 6.
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