

**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

21 November 2014

**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**

**Transition period for amendments relevant to Ammunition,  
Smoke, containing titanium tetrachloride; relating to  
document ST/SG/AC.10/C.3/2014/98**

**Transmitted by the expert from Austria**

*Summary*

**Executive summary:** The introduction of a transition period was supported during the discussion and is supported now but the wording of the proposed amendment, will not only introduce a transitional period but also a change of the existing requirements. The requirement of labelling an unpackaged article is not as clearly stated in the regulation as the requirement for marking.

**Reference documents:** ST/SG/AC.10/C.3/2014/73, ST/SG/AC.10/C.3/2014/98

**Introduction**

**Adopted text SP204:**

Articles containing smoke-producing substance(s) corrosive according to the criteria for Class 8 shall be labelled with a “CORROSIVE” subsidiary risk label (Model No 8, see 5.2.2.2.2).

Articles containing smoke-producing substance(s) toxic by inhalation according to the criteria for Division 6.1 shall be labelled with a “TOXIC” subsidiary risk label (Model No 6.1, see 5.2.2.2.2).

**Proposal (Doc. 98) SP204:**

Packages of articles containing smoke-producing substance(s) corrosive according to the criteria for Class 8 shall be labelled with a “CORROSIVE” subsidiary risk label (Model No 8, see 5.2.2.2.2).

Effective 1 January 2019, packages of articles containing smoke-producing substance(s) toxic by inhalation according to the criteria for Division 6.1 shall be labelled with a “TOXIC” subsidiary risk label (Model No 6.1, see 5.2.2.2.2).

The underlined amendment shows, that there might be a difference in the case of unpackaged articles. (*P130, PP67 and LP101, L1: The following applies to UN Nos. ..., 0015, 0016, ..., 0303, ...: Large and robust explosives articles, normally intended for military use, without their means of initiation or with their means of initiation containing at least two effective protective features, may be carried unpackaged. ....*)

If there is the requirement to label them in the same way as marking is required this would change the longstanding requirement (5.2.1.1 *In the case of unpackaged articles the marking shall be displayed on the article, on its cradle or on its handling, storage or launching device.*). If labelling of unpackaged articles is not required, the proposed amendment is more a clarification.

The second point of concern is the wording “Effective 1 January 2019, ” that is not the usual wording for a transition period, because it will not allow for using the new labelling from the beginning and in addition the old labelling for a certain period of time.

Therefore we think the following text is more adequate.

### **Alternative proposal:**

SP204

Articles containing smoke-producing substance(s) corrosive according to the criteria for Class 8 shall be labelled with a “CORROSIVE” subsidiary risk label (Model No 8, see 5.2.2.2.2).

Articles containing smoke-producing substance(s) toxic by inhalation according to the criteria for Division 6.1 shall be labelled with a “TOXIC” subsidiary risk label (Model No 6.1, see 5.2.2.2.2), except that those manufactured before 31 December 2016 may be carried until 1 January 2019 without a “TOXIC” subsidiary label.

---