



**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-six session**

Geneva, 1 – 9 December 2014

Item 8 (i) of the provisional agenda

**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals:
miscellaneous****Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals****Twenty-eight session**

Geneva, 10 – 12 December 2014

Item 7 of the provisional agenda

Programme of work for the biennium 2015–2016**Proposal for review of Chapter 2.1 (Explosives) in the GHS****Transmitted by the expert from Australia and by the Australian
Explosives Industry and Safety Group (AEISG)¹****Introduction**

1. At the twenty-seventh session of the GHS Sub-Committee the expert from Australia proposed informal document INF.20 (27th session) a review of Chapter 2.1 (Explosives) of the GHS to address issues with classification and hazard communication for explosives during manufacture, storage, handling and use when the explosives are not packaged for transport.
2. The expert from Australia noted the proposal did not extend to review of requirements for transport of explosives or amendment to any tests provided in the Manual of Tests and Criteria.

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).

3. There was general support for the proposal and for the need to clearly define the scope of the revision. The expert from Germany noted the TDG Sub-Committee had considered related issues in 2008 but the proposals put forward at that time² had not been supported.
4. The GHS Sub-Committee agreed to include this item in its programme of work for 2015-2016, and to seek the involvement of the TDG Sub-Committee as the focal point for physical hazards. The proposal also noted the expertise of the Working Group on Explosives would be sought on this work, and any progress of the work would be reported to both GHS and TDG subcommittees.
5. The purpose of this paper is to invite TDG Sub-Committee members, members of the Working Group on Explosives and relevant non-governmental organisations to participate in this work.

Discussion

6. Australia is currently reviewing national explosives legislation and is considering use of the GHS within that legislative framework in relation to defining and classifying explosives, along with hazard communication for explosives. Through this process, issues have been identified regarding the classification and hazard communication requirements for explosives across all stages of their life. These issues relate both from use of the GHS for this purpose, and also from use of transport classification and hazard communication elements in non-transport sectors.
7. The key issues being considered are:
 - (a) Is the classification and hazard communication information provided for explosives packaged for transport appropriate for other sectors, e.g. manufacture, storage and use?
 - (b) For explosives that are not packaged for transport – including those that have been removed from their transport packaging and those that are not transported – what is the correct classification of those explosives and what hazards need to be communicated to persons who manufacture, handle, store or use them?
8. The Australian review of explosives legislation has a strong focus on reducing regulatory burden on business. The current proposal would therefore not envisage any additional testing would be required for explosives packaged for transport, and for which appropriate testing had already been undertaken.
9. However, Australia believes guidance is needed to assist duty holders to meet their legislative obligations to ensure the hazards of explosives that are not packaged for transport are known and adequately communicated to ensure risks of explosives handled during manufacture, storage and use can be managed effectively.

Proposal

10. The purpose of the review is to understand where guidance is needed to assist duty holders classify or otherwise define explosives correctly and communicate hazards in non-

² See informal document INF.20 (fifteenth session), informal document INF.71 (thirty-third session), ST/SG/AC.10/C.3/2008/43, and ST/SG/AC.10/C.4/2008/6.

transport sectors, to ensure the high level of safety provided during transport is also provided in other parts of the explosives life cycle.

11. It is proposed that:

- (a) Chapter 2.1 of the GHS be reviewed to determine where amendments are needed, including development of additional guidance if required, on classification and hazard communication requirements for explosives to meet the needs of sectors other than transport, e.g. manufacture, storage and use;
- (b) Where additional guidance is deemed necessary, the content of such guidance be developed;
- (c) The work would not include a review of requirements for the transport of explosives, or changes to the tests of the Manual of Tests and Criteria for explosives;
- (d) The review would be cognisant of previous proposals by Germany, referred to above;
- (e) A correspondence group led by the expert from Australia be established to undertake this work inter-sessionally and include any interested parties from the TDG Sub-Committee, the Working Group on Explosives and relevant NGOs.

12. Australia proposes that issues including the following be considered as part of any review:

- (a) What are the classification and hazard communication needs for storage, manufacturing and use of explosives that are not packaged for transport?
- (b) What guidance can or should be provided in the GHS to ensure appropriate information is given to all people handling in the explosives life cycle?
- (c) If explosives are not yet, or are no longer packaged for transport, does the transport classification apply for safe storage, handling and use, including labelling of explosives? If not, can it be deduced without further testing of individual items?

13. The review will identify how best to provide further guidance in the GHS for non-transport sectors, which may include additional classification tables, additional notes or footnotes for current tables or an additional Annex comprising complementary information for classification and hazard communication during manufacture, storage, handling and use of explosives not packaged for transport.

14. Sub-Committee members, members of the Working Group on Explosives and NGOs are invited to contact the expert from Australia to be involved in the correspondence group for this work.
