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| **Committee of Experts on the Transport of Dangerous Goods  and on the Globally Harmonized System of Classification and Labelling of Chemicals 20 November 2015** | |
| **Sub-Committee of Experts on the Transport of Dangerous Goods** |  |
| **Forty-eight session** |  |
| Geneva, 30 November – 9 December 2015  Item 2 (i) of the provisional agenda  **Explosives and related matters: miscellaneous** |  |

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| **UN/SCETDG/48/INF.25** |

Comments on document ST/SG/AC.10/C.3/2015/47 Explosives excluded from the high consequence dangerous goods list in Chapter 1.4

Transmitted by the expert from Sweden

Introduction

1. At the forty-seventh session, Sweden proposed in informal document INF.38 (47th session) to include further explosives in the indicative list of high consequence dangerous goods in Chapter 1.4 of the UN Recommendations. The reasoning behind the proposal was that some explosives in the list may be excluded from the current security provisions when packaged differently, since packing measures might result in a less stringent classification for the concerned explosives.

2. Italy raised a similar issue at the 45th and 47th sessions in documents ST/SG/AC.10/C.3/2014/86 and informal document INF.47 (47th session). The same problem has also been high-lighted earlier by the United Kingdom in document ST/SG/AC.10/C.3/2005/39, where a number of explosives classified in Division 1.4 were added to the list in Chapter 1.4.

Discussion

3. For the forty-eighth session, the expert from the United Kingdom has submitted document ST/SG/AC.10/C.3/2015/47 concerning all n.o.s. entries in Division 1.4. Based on the same concerns regarding re-classification due to different packing measures, the United Kingdom is proposing that the competent authority must specify whether security provisions should be applied for these explosives or not.

4. The expert from Sweden believes that the proposal from the United Kingdom is a step in the right direction and supports the initiative. Nevertheless, Sweden still has concerns that security measures could be avoided for several other highly attractive explosives, when different packing measures are being used that result in a milder classification.

5. With reference to these arguments and to paragraphs 18 - 20 in the report from the 47th session (ST/SG/AC.10/C.3/94), Sweden would like to discuss the possibility to include additional explosive articles under specific UN numbers in Division 1.4 in the list of high consequence dangerous goods in Chapter 1.4.

6. The table below indicates the articles that, in our view, contain explosives identified as potential candidates for misuse and the possibility to create mass destruction or casualties, but due to packing procedures are not covered by the high consequence list and the security measures in Chapter 1.4.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | High Consequence | | **Non-High Consequence**  **due to packing** | |
| **Proper Shipping Name** | UN No | Hazard Code | **UN No** | **Hazard Code** |
|  |  |  |  |  |
| CARTRIDGES, POWER DEVICE | 0381 | 1.2C | 0276 | 1.4C |
|  |  |  | 0323 | 1.4S |
|  |  |  |  |  |
| CARTRIDGES, POWER DEVICE | 0275 | 1.3C | 0276 | 1.4C |
|  |  |  | 0323 | 1.4S |
|  |  |  |  |  |
| CARTRIDGES, OIL WELL | 0277 | 1.3C | 0278 | 1.4S |
|  |  |  |  |  |
|  |  |  |  |  |
| CHARGES, EXPLOSIVE, COMMERCIAL | 0442 | 1.1D | 0444 | 1.4D |
|  |  |  | 0445 | 1.4S |
|  |  |  |  |  |
| CHARGES, EXPLOSIVE, COMMERCIAL | 0443 | 1.2D | 0444 | 1.4D |
|  |  |  | 0445 | 1.4S |
|  |  |  |  |  |
| CHARGES, BURSTING, PLASTICS BONDED | 0457 | 1.1D | 0459 | 1.4D |
|  |  |  | 0460 | 1.4S |
|  |  |  |  |  |
| CHARGES, BURSTING, PLASTICS BONDED | 0458 | 1.2D | 0459 | 1.4D |
|  |  |  | 0460 | 1.4S |
|  |  |  |  |  |
| CHARGES, PROPELLING | 0271 | 1.1C | 0491 | 1.4C |
|  |  |  |  |  |
|  |  |  |  |  |
| CHARGES, PROPELLING | 0415 | 1.2C | 0491 | 1.4C |
|  |  |  |  |  |
|  |  |  |  |  |
| CHARGES, PROPELLING | 0272 | 1.3C | 0491 | 1.4C |
|  |  |  |  |  |

7. In summary, it is the explosive content, not the packing measures that are crucial for the potential of misuse in a terrorist action or other criminal activities.

Proposal for discussion

8. Add the following UN Numbers to the indicative list of high consequence dangerous goods in Table 1.4.1 of the UN Model Regulations: UN 0276, 0278, 0323, 0444, 0445, 0459, 0460 and 0491.