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

14 November 2017

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-second session

Geneva, 26 November-6 December 2017

Item 2 (j) of the provisional agenda

**Explosives and related matters:
miscellaneous**

Comments on UN0222 Ammonium nitrate

Transmitted by the Institute of Makers of Explosives

Background

1. The Dangerous Goods List has an entry for ammonium nitrate, UN0222, which is not a commercially manufactured product.

Discussion

2. As far as IME is aware, UN0222 is not manufactured as a commercial product by explosives manufacturers.
3. SP370, which applies to UN0222, states, “ammonium nitrate with more than 0.2% combustible substances, including any organic substance calculated as carbon, to the exclusion of any added substance; and ammonium nitrate with not more than 0.2% combustibles, including any organic substance calculated as carbon, to the exclusion of any added substance, that gives a positive result when tested in accordance with Test Series 2...”
4. Explosives manufacturers who make Class 1 blasting agents from ammonium nitrate do so by the addition of approximately 6% fuel oil. Such a substance is Class 1, and is transported as Division 1.5.
5. Ammonium nitrate manufacturers who make solid ammonium nitrate, would ship product as Division 5.1 after ensuring that the ammonium nitrate does not show a positive in Test Series 2. The ammonium nitrate solid would be shipped as UN1942 or UN2067, both of which must contain less than 0.2% combustibles.
6. Since this ammonium nitrate product is listed in the Dangerous Goods List in Chapter 3.2 of the UN Model Regulations, it does get called upon by other jurisdictions since ammonium nitrate is a security sensitive chemical.
7. IME supports the intended clarification for AN-based fertilizers but has concerns as expressed above.

Proposal

8. IME invites discussion in the Sub-Committee and it's working group on explosives to consider a proposal to remove UN0222 from the Dangerous Goods List since this substance is not commonly manufactured nor transported. If such a proposal might be acceptable to the Sub-Committee, IME will prepare a formal proposal for the next session taking into account comments received during discussions at the current session.
