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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****Sub-Committee of Experts on the Transport of Dangerous Goods****Fifty-seventh session**

Geneva, 29 June-8 July 2020

Item 2 (e) of the provisional agenda

**Explosives and related matters:****review of packing instructions for explosives****Correction or amendment to packing instruction P137,  
special packing provision PP70****Transmitted by the expert from the United Kingdom\*, \*\*****Summary**

1. The expert from the United Kingdom proposes a correction to the current text of P137 PP70, so that it accurately reflects the requirements found in earlier versions of the packing instruction special provision in relation to the use of orientation marks.

**Background**

2. At the forty-fifth session of the Sub-Committee, the expert from the United Kingdom presented document ST/SG/AC.10/C.3/2014/58. This sought to clarify the size of lettering on packages where such requirements were found in special provisions. In the course of research, the United Kingdom also found that there was a conditional requirement in P137, special packing provision PP70 to mark packages “This side up”. The United Kingdom decided that rather than define the size of the lettering, it would be easier to refer to orientation marks (no language issues). The proposal was included with the others found in special provisions but the United Kingdom recognised that as P137 was a packing instruction for explosives, the proposal should be referred to the Explosives Working Group.

3. Paragraph 8 of the report of the forty-fifth session indicates which papers were referred to the Explosives Working Group and which were not. There is no record to indicate if the proposal in paragraph 8 of document ST/SG/AC.10/C.3/2014/58, as listed under item 7 (f) of the agenda was ever offered to the Explosives working Group for consideration. The report from the Explosives Working Group meeting does not refer to it, so it has to be

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\* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2)

\*\* This document was scheduled for publication after the standard publication date owing to circumstances (CORVID-19) beyond the submitter's control.

assumed that any discussion was in plenary. However, the plenary report covering document ST/SG/AC.10/C.3/2014/58 shows that the proposals were adopted except that it was decided to require a minimum size of 12 mm.

4. The amendment resulted in the following change:

“Conical cavity shall face downwards and the package marked “THIS SIDE UP”” should be amended to read:

“Conical cavity shall face downward and the package shall be marked in accordance with 5.2.1.7.1.”

5. The intention was to show the required orientation by replacing the text on the top of the packaging with orientation arrows on the side. However, the first part of 5.2.1.7.1 lays down the applicability of orientation marks; and the types of packaging to which they apply do not include in any form packagings containing articles or combination packages containing solids. Therefore, the current regulations do not require orientation marks on packages meeting P137. This is clearly not the intention of the change.

6. In addition, while examining the classification detail behind the UN numbers listed, it also became apparent that some of the classification criteria meant that the reason for orientation could not occur in transport. Classifications 1.4D and 1.4S can only be obtained if there is no more than a slight explosive hazard with the packaging containing most of the effect. Packages where significant jetting occurred during classification tests would therefore not be assigned 1.4.

### **Amending proposals**

7. The Explosives Working Group is invited to consider the following proposals to amend the wording special packing provision PP70 in packing instruction P137 to align the text to meet the original requirement (proposals 1 to 3) and to consider proposal 4 to remove the requirement to apply PP70 to UN Nos. 0440 and 0441 (old text ~~struck out~~, new text underlined).

8. Amend the first sentence of PP70 with one of proposals 1 to 3 set out below with the subsequent deletion of UN Nos. 0440 and 0441 if proposal 4 is adopted.

#### **Proposal 1**

“For UN Nos. 0059, 0439, 0440 and 0441, when the shaped charges are packed singly, the conical cavity shall face downwards and the package shall be marked as illustrated in figures 5.2.3 or 5.2.4 in accordance with 5.2.1.7.1 on two opposite sides.”

#### **Proposal 2**

“Notwithstanding the scope and exceptions provided in 5.2.1.7.1, for UN Nos. 0059, 0439, 0440 and 0441, when the shaped charges are packed singly, the conical cavity shall face downwards and the package shall be marked as described in accordance with 5.2.1.7.1.”

#### **Proposal 3**

“For UN Nos. 0059, 0439, 0440 and 0441, when the shaped charges are packed singly, the conical cavity shall face downwards and the package shall be marked ~~in accordance with 5.2.1.7.1~~ “THIS SIDE UP” and the marking sized in accordance with 6.1.3.1.”

#### **Proposal 4**

Delete special packing provision PP70 from UN Nos. 0440 and 0441 in column (9) of the dangerous goods list in Chapter 3.2 and from P137, special packing provision PP70 in 4.1.4.1.