

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

9 November 2017

**Sub-Committee of Experts on the
Transport of Dangerous Goods**

Fifty-second session

Geneva, 26 November - 6 December 2017

Item 10 (d) of the provisional agenda

**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals:
Use of the Manual of Tests and Criteria in the
context of the GHS**

**Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals**

Thirty-fourth session

Geneva, 6-8 December 2017

Item 2 (a) of the provisional agenda

**Classification criteria and related hazard
communication:
Work of the Sub-Committee of Experts on the
Transport of Dangerous Goods (TDG) on matters of
interest to the GHS Sub-Committee**

Comments on INF.3/Add.1, figures 10.1 and 10.4

**Transmitted by Australian Explosives Industry and Safety Group
Incorporated (AEISG)**

Alternative figure 10.1

The term “unstable” as applied to explosives in the context of GHS generates confusion and can be avoided in Table 10.1 as shown below.

Alternative figure 10.4

AEISG believes that Figure 10.4 needs a rethink given it is now relevant to GHS.

It is the opinion of AEISG that boxes 7 and 8 should never have been different.

An ANE which fails either of these tests, 8(b) or (c), is a candidate for Division 1.5:

- If it passes TS5, it is Division 1.5.
- If it fails TS5, it is Division 1.1.

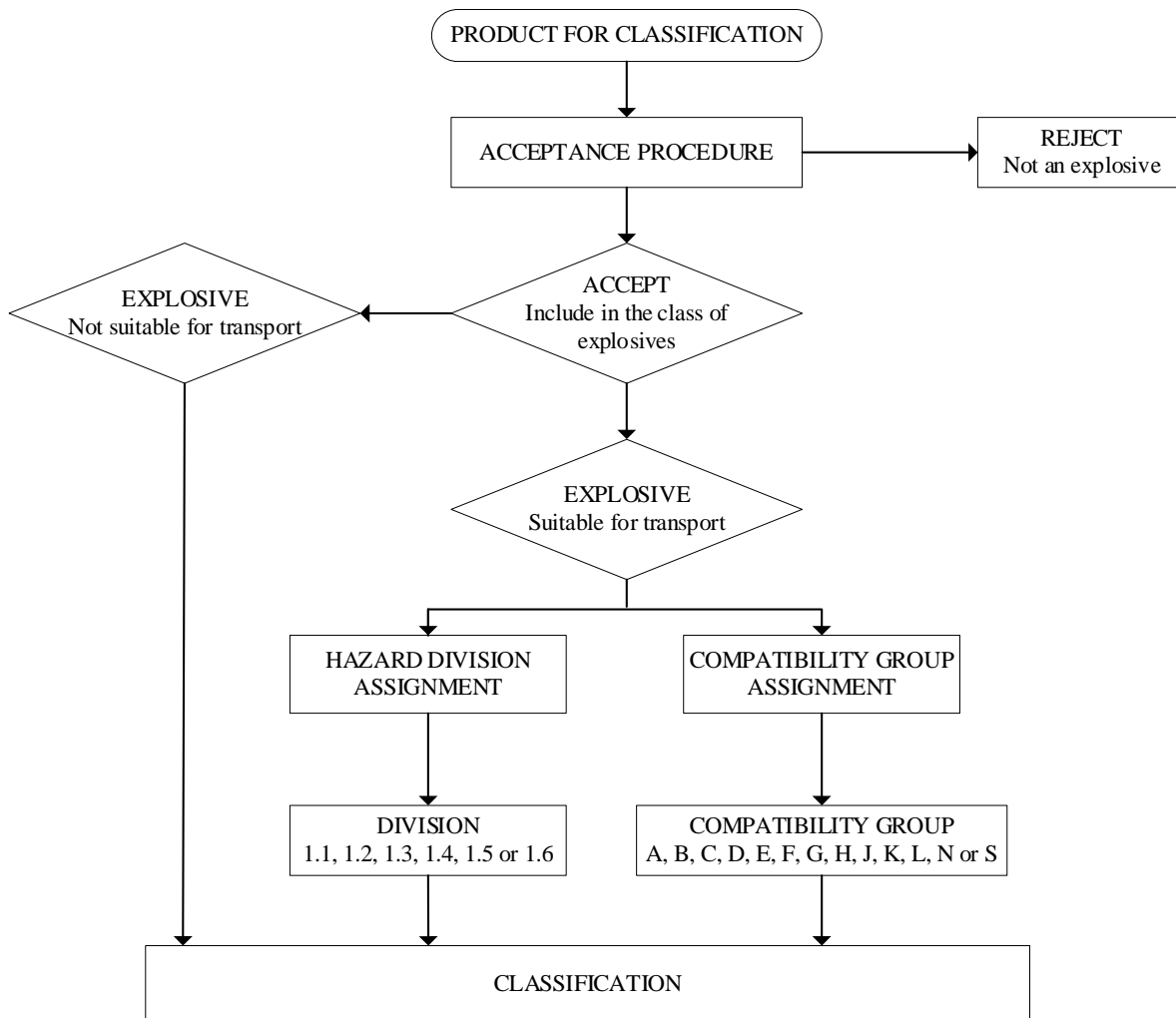
The issue which complicates things is an ANE product which fails Test 8(a) – refer Box 2. It is then EITHER an unstable Explosive OR an unstable Oxidising substance, depending on the results of TS8(b) and (c).

The diagram for Figure 10.4 then becomes overly complex.

AEISG proposes an alternative Figure 10.4 with a “Results table” included which we believe is far simpler to interpret.

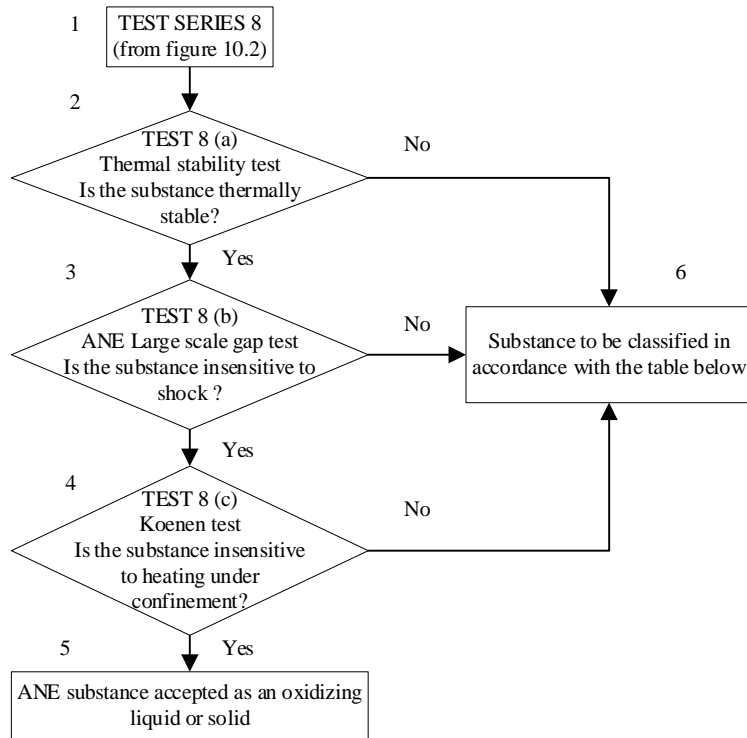
AEISG alternative figure 10.1

Figure 10.1: OVERALL SCHEME OF THE PROCEDURE FOR CLASSIFYING A SUBSTANCE OR ARTICLE IN THE CLASS OF EXPLOSIVES



AEISG alternative figure 10.4

Figure 10.4: PROCEDURE FOR AMMONIUM NITRATE EMULSION, SUSPENSION OR GEL, INTERMEDIATE FOR BLASTING EXPLOSIVES



Test 8 (a)	Test 8 (b)	Test (c)	CLASSIFICATION
Pass (-)	Pass (-)	Fail (+)	Classify as an explosive
Pass (-)	Fail (+)	Pass (-)	Proceed to Test Series 5 to determine hazard division
Pass (-)	Fail (+)	Fail (+)	Classify as an unstable explosive (not suitable for transport)
Fail (+)	Pass (-)	Fail (+)	
Fail (+)	Fail (+)	Pass (-)	
Fail (+)	Fail (+)	Fail (+)	Classify as an oxidizing solid or liquid, not suitable for transport
Fail (+)	Pass (-)	Pass (-)	