

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

Twenty-seventh session
Geneva, 4-8 July 2005
Item 3 (b) of the provisional agenda

EXPLOSIVES, SELF-REACTIVE SUBSTANCES AND ORGANIC PEROXIDES

Comments on ST/SG/AC.10/C.3/2005/22

Transmitted by the expert from the United States of America

1. In ST/SG/AC.10/C.3/2005/22, the expert from Canada proposes to add a new test, unconfined 6(a) Test, and new criteria for classifying explosive articles in Div. 1.4S. The expert from Canada cites the need for this new test and criteria based on limited test results conducted on certain shaped charges. No other examples or data are provided to demonstrate that the current classification criteria prescribed in the UN Test Manual for Div. 1.4 S articles are inadequate. Furthermore, the proposed new criteria appear to be arbitrarily chosen without any justification.
 2. The Sub-Committee will recall that the Committee spent over four years of effort (1995 to 1998) to revise the test methods and criteria for the 6(c) test in the Manual of Tests and Criteria. The Committee developed specific criteria for classifying explosives into various divisions including Div. 1.4 and 1.4S. These criteria are reflected in paragraphs 16.6.1.4.5 and 16.6.1.4.6 of the Test Manual.
 3. It is recognized that there may be some variation in the interpretation of the note under 2.2.2.4 (d) in the UN Model Regulations which takes into account "hazardous effects" of the product arising from accidental functioning. With the revisions that have been introduced in the 6(c) test, the expert from the United States of America believes that the hazardous effects referred to in the note of 2.1.1.4 (d) should be regarded as the same effects that are used to define 1.4 S in the 6(c) test. The expert from the United States of America regards the criteria for 1.4S in the revised 6(c) test taken together with criteria that are already included in the 6(a) and 6(b) tests as comprehensive and does not consider there to be a need for further revision of the 1.4S criteria. Therefore, we cannot support the proposal by the expert from Canada presented in ST/SG/AC.10/C.3/2005/22.
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