

## 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

7 June 2010

### Thirty-seventh session

Geneva, 21–30 June 2010

Item 8 of the provisional agenda

### Global harmonization of transport of dangerous goods regulations with the Model Regulations

## New Special Provision for Potassium/Sodium Nitrates: Decisions Taken by the IMO

### Transmitted by the European Fertilizer Manufacturers' Association (EFMA)

1 At the thirty-sixth session of the Sub-Committee of Experts on the Transport of Dangerous Goods in December 2009, International Maritime Organization (IMO) informed the Sub-Committee of the decision taken by DSC 14 (Ref: UN/SCETDG/36/INF.30) to assign a new special provision 964 (see text below), to UN 1486 (potassium nitrate), UN 1498 (sodium nitrate) and UN 1499 (sodium nitrate and potassium nitrate mixture), all substances of Class 5.1, PG III.

"964 This substance is not subject to the provisions of this code when transported in non friable prills or granules form and if it passes the test for oxidizing solid substances as reflected in the United Nations *Manual of Test and Criteria* (see 34.4.1) and is accompanied by a certificate from a laboratory accredited by a competent authority, stating that the product has been correctly sampled by trained staff from the laboratory and that the sample was correctly tested and has passed the test."

2 As stated in the Report of the Sub-Committee of Experts on the Transport of Dangerous Goods at its thirty-sixth session (ST/SG/AC.10/C.3/72, paragraphs 99-102), several experts regretted the IMO decision and the Sub-Committee invited experts to submit written papers for the next session.

3 European Fertilizer Manufacturers' Association (EFMA) wishes to express its concerns regarding the proposal to assign this special provision to the UN 1486, 1498 and 1499 based on their physical form, and is of the opinion that this may be detrimental to safety.

4. These 3 substances have always been classified as oxidizers based on experience with their use as oxidising agents.

5. As mentioned in 2.5.2.1.1 in the Model Regulations and in 34.3 of the Manual of Tests and Criteria, judgement based on known experience should take precedence over test results even if the tests fail to show these substances as oxidizers.

6. EFMA wishes to point out that there are other oxidizing substances e.g. ammonium nitrate based straight nitrogen fertilizers (UN 2067), which are transported in granular/prill form and which would equally fail to exhibit oxidizing behaviour in the tests. If this precedence is set, these substances could become potential candidates for a similar exemption. In EFMA's opinion the relaxation offered by the assignment of SP 964 to these

substances would be contrary to overall safety. Indeed, when exempted from requirements for transport purposes, there is a significant risk that safety provisions (e.g. separation from combustible materials) required for transport and other purposes such as storage may not be applied in practice.

4. Therefore EFMA does not recommend assigning SP 964 to UN 1486, UN 1498 and UN 1499.

8. With reference to the comment from the observer from Chile regarding the exemptions given to other substances such as commercial grades of calcium nitrate fertilizers, EFMA wishes also point out that this product is chemically a different substance from pure calcium nitrate (class 5.1) as stated in special provision 208; it is mainly a double salt containing not more than 10% ammonium nitrate and at least 12% water of crystallisation.

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