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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****22 May 2013****Forty- third session**

Geneva, 24 – 28 June 2013

Item 2 (f) of the provisional agenda

**Explosives and related matters: miscellaneous****Proposal for additional guidance on the contents of  
Competent Authority Documents (CAD)****Transmitted by the expert from the United Kingdom****Introduction**

1. As part of the underlying principles of the Model Regulations, competent authorities are charged with ensuring compliance with the Regulations, including the monitoring of the classification of dangerous goods, to ensure the requirements of the Regulations are being met in practice. As part of its role in ensuring that the safety obligations of the various participants in the modal regulations are met, the competent authority for the United Kingdom is often called upon to consider Competent Authority Documents<sup>1</sup> produced by a number of competent authorities for the classification of substances and articles in Class 1 (Explosives).
2. In the experience of the competent authority for the United Kingdom, Competent Authority Documents come in a range of formats and contain different categories of information.
3. The absence of a common format to such documents can make it difficult to ensure that the safety obligations of the various participants in the implementation of the Model and modal regulations have been met. This can mean that confirming the hazards presented by explosives during international transport is sometimes difficult and hinders the checking of compliance with the original classification.
4. The expert from the United Kingdom asks if, in the opinion of the members of the explosives working group, there would be value in the Model Regulations or the Manual of Tests and Criteria containing an example of the minimum information that should be contained in a Competent Authority Document and any associated schedules.
5. The expert from the United Kingdom reminds the members of the explosives working group of the significant benefits for the communication of hazards and the facilitation of the international transport of goods that the wide adoption of the standardised Multimodal Dangerous Goods Form (Figure 5.4.1 of ST/SG/AC.10/Rev.16 (Vol. II)) has had.

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<sup>1</sup> In this paper the term Competent Authority Documents is used to mean the formal written record of the classification assigned by the relevant competent authority for a particular substance or article in Class 1.

## Discussion

6. The key objectives of the CAD are considered to be that it:
- Confirms that the explosive has been assessed by a relevant competent authority;
  - Clearly identifies the explosive that is the subject of the classification;
  - Clearly assigns the explosive to a UN number, hazard classification and compatibility group;
  - Identifies any special conditions that have been taken into account when assigning the classification<sup>2</sup>; and
  - Identifies the person or organisation responsible for ensuring compliance with its requirements.
7. The expert from the United Kingdom has sponsored a brief review of CADs issued by a number of competent authorities. This review has been limited to exclude fireworks classified by the methodology described at 2.1.3.5 of ST/SG/AC.10/Rev.17 (Vol. I) as these are considered a special case.
8. The review considered the information that is currently being provided by competent authorities and generic examples are summarised below. The examples were also categorised as to whether they provided:
- Essential information in meeting the key objectives outlined above;
  - Important supporting information to the key objectives and demonstrating good practice; or
  - Useful information that was considered best practice.
9. The examples of essential information identified were:
- (a) The CAD bears the name of the competent authority and the provisions in national legislation under which it is granted its authority. *(This allows appropriate checks to be made on the validity of the CAD)*
  - (b) The CAD lists the modal or national regulations to which the CAD is considered to be applicable. *(Different competent authorities in different jurisdictions often have different responsibilities)*
  - (c) The CAD states that the classification has been approved, made or agreed in accordance with the recommendations of the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods or the relevant modal regulations.
  - (d) The CAD states the name and address of the person in law who has made the application for a CAD and any company registration which uniquely identifies a company or other body corporate under national legislation. *(This information allows appropriate checks and enquiries to be made on the validity of the CAD and the compliance of the various participants with their safety obligations.)*
  - (e) The CAD states the name under which the explosives will be placed onto the market or otherwise supplied for transport. *(This information allows appropriate checks and enquiries to be made on the classification status of the explosives and the compliance of the various participants with their safety obligations. The name that*

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<sup>2</sup> Special conditions would include any specific packaging requirements where they are integral to the hazard classification assigned.

appears on the CAD should be the same as that appearing on the exterior of any packaging.)

(f) The CAD states the Proper Shipping Name, UN number, UN Class, Hazard Division and corresponding compatibility group of the explosives.

(g) Where safety in transport or the hazard division is assessed as being dependant upon a particular outer packaging, the CAD states the packaging mark.

(h) The CAD states the maximum NEC of the package or article. *(This information allows appropriate checks and enquiries to be made on the classification status of the explosives and the compliance of the various participants with their safety obligations.)*

(i) The name, signature, stamp, seal or other identification of the person authorised by the competent authority to issue the CAD is clearly visible.

(j) Where safety in transport or the hazard division is assessed as being dependant upon the packaging the CAD lists the permitted:-

- Inner packagings,
- Intermediate packagings
- Outer packagings.

*(e.g. for P130 inner packagings – bags plastic; intermediate packagings – none; outer packagings – boxes, fibreboard (4G) or drums, fibre (1G))*

10. The following was considered to be an example of good practice:

(a) The CAD states the part number, stock number or other identifying reference under which the explosives will be placed onto the market or otherwise supplied for transport. *(This information allows appropriate checks and enquiries to be made on the classification status of the explosives and the compliance of the various participants with their safety obligations. The part number etc. that appears on the CAD should be the same as that appearing on the exterior of any packaging.)*

11. The following were considered examples of best practice:

(a) The CAD states that the classification has been made:-

- On the basis of tests on the item or substance itself:
- On the basis of tests on similar items in their transportation packaging:
- On the basis of a prescribed definition or default.

(b) The CAD states the name and address of the person in law who manufactured the explosives and any company registration which uniquely identifies a company or other body corporate under national legislation *(This information allows appropriate checks and enquiries to be made on the validity of the CAD and the compliance of the various participants with their safety obligations.)*

(c) The CAD lists any alternative names or part numbers, stock numbers or other identifying references under which the explosives will be placed on the market or otherwise supplied. *(A single item or substance can often be supplied to several different customers under different names etc. Listing those alternatives readily facilitates checks on the classification status of an explosive).*

(d) The CAD states the applicable Packing Instruction and Special Packing Provisions.

- (e) Where safety in transport or the hazard division is assessed as being dependant upon how articles are packed within the inner, intermediate and outer packagings the packing method is described in words or is identified by a relevant reference number (*e.g. the reference code of a set of descriptive drawings or that of the method of work used to pack the substances or articles and against which the tests have been conducted or the analogy assessed*)
- (f) The CAD lists any special conditions or limitations that the competent authority has identified as relevant to the safety for transport of the explosives, the communication of the hazard and international transport.
- (g) he expiry date of the CAD is given where the competent authority considers one to be appropriate.

## **Proposal**

- 12. That the members of the explosives working group consider whether there are further examples of good practice for CADs in addition to those identified by the expert from the United Kingdom which should be considered.
  - 13. That the members of the explosives working group identify the good practice information that is considered to be necessary if a CAD and any associated schedules are to be used in ensuring that the safety obligations of the various participants in the implementation of the Model Regulations have been met.
  - 14. That, if the members of the working group agree that a common set of information to be contained within a CAD or its associated schedules would be beneficial, the expert from the United Kingdom should prepare a Working Document for the 44th Session of the UN Sub-Committee of Experts on the Transport of Dangerous Goods.
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