

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

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Item 2 (f) of the provisional agenda:

Explosives and related matters: miscellaneous

Harmonized International Standard for Explosives Traceability Markings

Transmitted by the Institute of Makers of Explosives (IME)

Introduction

1. Security of dangerous goods during their transport is addressed by this sub-committee in Chapter 1.4 of the Model Regulations. The security of explosives is an issue addressed daily by the Institute of Makers of Explosives. On the issue of the security of dangerous goods, and specifically explosives, it appears that the sub-committee and IME have common interests and commitments.
2. An element that contributes to security of explosives is the ability to trace recovered lost or stolen explosives from their origin to their last known point of legal ownership. This ability often aids law enforcement in their efforts to identify those who would use explosives in unlawful endeavors. It also serves as a deterrent to those on the inside who might divert explosives.
3. Critical to successful tracing of recovered explosives is the placement of marks on explosive devices and packages that are unique enough to aid in the tracing process. Requirements for such markings have long been a regulation in the USA.
4. Recently, in an effort to harmonize such marking requirements throughout the European Union, the European Commission has implemented Directive 2008/43/EC (as amended by Directive 2012/4/EU) that establishes criteria for serialization, marking and traceability of explosives.
5. Other countries have also recently mandated, or have under consideration, requirements for marking, serialization and/or traceability of explosives. These include: Argentina, Australia, Brazil, Canada, China, India, Kazakhstan, Peru, and Russia.
6. The result is a proliferation of disparate systems instituting differing means and formats of labelling for traceability. The recent implementation of these disparate systems has raised some issues for member companies of the IME who export products to the European Union and elsewhere.

Discussion

7. In recent decades, the explosives industry has consolidated globally and become organizations that trade internationally. The disparate systems for traceability create two issues namely, (1) the complexity of tracing products that illegally cross country

boundaries, and (2), the added costs to manufacturers who have to identify, maintain inventories and record individual lots that are destined for the different countries. The added complexity for the manufacturers and the fact that products enter countries illegally would make traceability of such a product significantly more difficult and, since there is no coordination of serialization systems, the same marking could have different meanings in different countries.

8. IME is of the opinion that explosives security could be significantly enhanced by the development and implementation of a single, harmonized international standard regarding the traceability marking of explosives.

9. This sub-committee has developed recommendations, published in the Model Regulations, which serve as the basis for a harmonized system of regulations ensuring safe and secure transport of dangerous goods. That is to say, this sub-committee is very experienced and internationally recognized as expert in the development of harmonized international standards. And, as noted above, this sub-committee regularly addresses the security of dangerous goods during transport.

10. Although the tracking and tracing of explosives is more of a law enforcement issue, the development of a harmonized international marking standard could well be done utilizing the vast experience the sub-committee possesses in the development of similar standards.

11. If the sub-committee does not believe this work is within their scope, IME is seeking support from the sub-committee for not only the concept of a unified marking standard, but also to help identify what international forum would be appropriate to take on such a project.

Consideration

12. The sub-committee is requested to consider whether the development of an internationally harmonized standard for traceability marking of explosives is a project that it could include in its work program.

13. If development of such a standard does not fit well within the work program of the sub-committee, the sub-committee is requested to provide guidance to IME as to what organization might be best suited for the task.
