

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

17 June 2014

Forty-fifth session

Geneva, 23 June – 2 July 2014

Item 2 (e) and 11 (i) of the provisional agenda

**Issues relating to the Globally Harmonized System of
Classification and Labelling of Chemicals; miscellaneous**

Use of the Manual of Tests and Criteria in the context of the GHS

Comments on ST/SG/AC.10/C.3/2014/61 (ST/SG/AC.10/C.4/2014/8) and supporting INF documents

Transmitted by the Institute of Makers of Explosives (IME)

1. IME recognizes and thanks the secretariat for the extensive effort put forth in preparing ST/SG/AC.10/C.3/2014/61, its supporting informal documents, and its GHS counterparts.
2. IME also recognizes the importance of the introduction of GHS context into the UN Manual of Tests and Criteria (MTC), supports the concept, and looks forward to participating in the appropriate completion of this project.
3. In ST/SG/AC.10/C.3/2014/61, the secretariat advises that the 5th Revision of the MTC is nearing the end of its review cycle and that publication of the 6th Revision is imminent. The secretariat seeks to complete the review described in ST/SG/AC.10/C.3/2014/61 in time to be included into the 6th Rev of the MTC.
4. IME maintains that this review should be conducted thoroughly so as to avoid any unintended and negative consequences to the transport context of the MTC and to current transport classifications resulting from the use of the tests in the MTC. Furthermore the TDG and GHS sub-committees need to be assured that the proposed changes fully meet the GHS purposes. We believe that there is insufficient time to complete the necessary comprehensive review during the current biennium to coincide with the publication of the 6th Rev. of the MTC.
5. Much of the review will be tasked to this sub-committee's explosives working group (EWG), which will meet only from 23 (pm) – 27 (am) June during the 45th Session. During this limited time, the EWG must review some twenty-four working and INF papers dealing with fireworks classification, review of test series 6, review of the tests in parts I and II of the MTC, review of the explosives packing instructions, desensitized explosives, and various other issues. This workload does not include review of ...C.3/2014/61 and its supporting documents. In our opinion, it would be impossible for the EWG to complete a thorough and adequate review of ST/SG/AC.10/C.3/2014/61 in the time allotted to it during the 45th Session.
6. It is our experience that an extensive review such as described in ST/SG/AC.10/C.3/2014/61 is best conducted beginning with a clean document. Accordingly, we believe it would be best to begin this work immediately after the

publication of the 6th Rev. of the MTC. This would allow the reviewers to concentrate solely upon the revisions described in ST/SG/AC.10/C.3/2014/61 and its supporting documents without the need to recall and coordinate revisions and edits that are pending prior to publication of the 6th Rev. of the MTC.

Recommendation

7. IME recommends that the sub-committee postpone review of ST/SG/AC.10/C.3/2014/61 and its supporting documents until after publication of the 6th Rev. of the MTC with a goal of completion by the end of the next biennium (2015 – 2016).
