

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 2 (c) of the provisional agenda

Explosives and related matters: electronic detonators

Comments to ST/SG/AC.10/C.3/2017/14 about new UN entries for electronic detonators

Transmitted by the expert from Sweden

Introduction

1. The expert from Australian Explosives Industry and Safety Group (AEISG) proposed in ST/SG/AC.10/C.3/2017/14 to add three new UN entries for electronic detonators, in analogy to the present Model Regulations for non-electric detonators, electric detonators etc.

2. The expert from Sweden noticed that there are already 13 UN entries for detonators, UN Nos. 0029, 0030, 0073, 0255, 0267, 0360, 0361, 0364, 0365, 0366, 0455, 0456 and 0500. Some entries are necessary to differentiate applicable transport conditions for different detonators. However, some entries having exactly the same transport conditions are used to differentiate the technical features of the detonators, although these technical features do not have any influence on the transport regulations. For example, UN Nos. 0030 and 0360 are transported under the same conditions.

3. It is recognized that electronic detonators differ from electric detonators. It may cause confusion during handling and storage, if electronic detonators are not separated from electric detonators. However, for the purpose of transport, it is not necessary to differentiate electronic detonators from electric detonators. That is to say that the same transport provisions can be applied for both types of detonators. In our view, to add new UN entries to differentiate the technical features of electronic detonators may cause the Model Regulations to become lengthy and more difficult in application.

4. The Swedish expert proposes to amend the name and description for UN Nos. 0030, 0255 and 0456 to include electronic detonators. By this amendment, the electronic detonators will be transported under the same conditions as UN Nos. 0030, 0255 and 0456. In this aspect, this proposal does not conflict with the proposal from AEISG.

Proposal

5. Instead of introducing new UN entries for electronic detonators, the Swedish expert proposes to amend the name and description for UN Nos. 0030, 0255 and 0456 in the Dangerous Goods List in Chapter 3.2 to read as follows (new text underlined):

“DETONATORS, ELECTRIC OR ELECTRONIC for blasting”.

Corresponding amendment in Glossary of Terms in Appendix B is necessary for the term “Detonator”.
