
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

Fifty-third session

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Item 2 (j) of the provisional agenda

Explosives and related matters: miscellaneous

Additional LP101 entries into the Dangerous Goods List

Transmitted by the expert from the United Kingdom

Background

1. At the 52nd meeting of the Sub-Committee the expert from the United Kingdom introduced document ST/SG/AC.10/C.3/2017/48. This was passed to the Explosives working group for consideration. The paper was generally well received, but there were some queries from Canada that could not be resolved within the timeframe of the meeting. As a result, the United Kingdom withdrew the paper and agreed to further discuss the queries with Canada between sessions, with a view to resolving them, and submitting a new paper to the 53rd meeting.
2. In preparing a response to the original Canadian queries, the expert from the United Kingdom realised that there was a further inconsistency with the application of the large packing instruction LP101. The queries have been resolved with Canada and, during the course of the discussions, the Canadian expert made a suggestion in regard to the further inconsistency. This has been incorporated in this revised proposal.

Additional inconsistency

3. In preparing a response to the Canadian queries, the expert from the United Kingdom realised that because the only items covered by the large packaging were those with large packing special provision L1 (a duplication of P130 PP67), the large packaging instruction is redundant in its present form. Both PP67 and L1 allow large robust items to travel unpackaged. Since packing instruction P130 does not assign any net masses to particular packing types, the only restriction on content would come from Chapter 6.1.
4. The net masses though are assigned to type approved packages, and PP67 removes the requirement to use an approved package. Effectively, a large and robust item is covered by PP67 irrespective of its mass. Given that a large packaging has a net content in excess of 400 kg, it is unlikely that an individual item of this size would not be robust so there is nothing that needs packing according to LP101. Either on the basis of size or that it is not already covered by PP67 in P130.

Proposal 1

5. To add in Column 8 of the Dangerous Goods List LP101 underneath P130 for the following 35 UN number entries:

0005, 0007, 0012, 0014, 0033, 0037, 0136, 0167, 0180, 0238,
0240, 0242, 0279, 0291, 0294, 0295, 0324, 0326, 0327, 0330,
0338, 0339, 0348, 0369, 0371, 0413, 0414, 0417, 0426, 0427,
0453, 0457, 0458, 0459, 0460.

6. There are no consequential amendments and the use of large packaging for these explosive items will still be subject to both classification testing and UN large packaging testing.

(This is the same proposal from ST/SG/AC.10/C.3/2017/48)

Proposal 2

7. Delete the special packing provision PP67 from packing instruction P130 and L1 from LP101 and replace with:

“Additional provision See 4.1.5.XX”

8. In the dangerous goods list delete from Column (9) references to PP67 (59 times) and L1 (59 times).

9. Insert a new 4.1.5.XX, to read as follows:

“4.1.5.XX

Large and robust explosives articles

For UN Nos. 0006, 0009, 0010, 0015, 0016, 0018, 0019, 0034, 0035, 0038, 0039, 0048, 0056, 0137, 0138, 0168, 0169, 0171, 0181, 0182, 0183, 0186, 0221, 0243, 0244, 0245, 0246, 0254, 0280, 0281, 0286, 0287, 0297, 0299, 0300, 0301, 0303, 0321, 0328, 0329, 0344, 0345, 0346, 0347, 0362, 0363, 0370, 0412, 0424, 0425, 0434, 0435, 0436, 0437, 0438, 0451, 0488, 0502 and 0510:

Large and robust explosive articles, normally intended for military use, without their means of initiation or with their means of initiation containing at least two effective protective features, may be carried unpackaged. When such explosive articles have propelling charges or are self-propelled, their ignition systems shall be protected against stimuli encountered during normal conditions of transport. A negative result in Test Series 4 on an unpackaged explosive article indicates that the explosive article can be considered for transport unpackaged. Such unpackaged explosive articles may be fixed to cradles or contained in crates or other suitable handling devices.”