

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

15 November 2018

Fifty-fourth session

Geneva, 26 November-4 December 2018

Item 2 (b) of the provisional agenda

**Recommendations made by the Sub-Committee on its fifty-first,
fifty-second and fifty-third sessions and pending issues:
explosives and related matters**

Comment on document ST/SG/AC.10/C.3/2018/114, Reassigning packing instructions PP67 and L1 to a new special provision

Submitted by the Government of Finland

Background

1. In the fifty-second meeting of the TGD, Finland proposed in the informal paper INF.21 (52nd session) to create a new UN Number for MINES with bursting charge 1.6D. After the discussions in Explosives Working Group and also in plenary, it was agreed, that this product may be classified to UN 0486 and it could be transported unpackaged according to P101. During the discussions some doubts were expressed regarding the interpretation of P101 and whether it is possible to transport articles unpackaged according to P101. Finland is likewise of the opinion that the text of P101 is not clear.

2. In the report ST/SG/AC.10/C.3/104, in paragraph 35, it was recorded that the Sub-Committee noted that the Working Group confirmed that if the articles described in informal document INF.21 meet Test Series 7 criteria, they could be classified under UN No. 0486, 1.6N. Therefore there was no need to develop a specific entry in the dangerous goods list for this purpose. It was the view of the Working Group that P101 does not exclude the possibility for unpackaged transport.

3. Based on the discussions in the fifty-second meeting, in addition to the United Kingdom proposal ST/SG/AC.10/C.3/2018/114, Finland proposes to add a new SP[xxx] also to UN 0486 to clarify that UN 0486 could also be transported unpackaged. This insertion will clearly indicate that UN 0486 could also be transported unpackaged. UN 0486 is class 1.6N, ARTICLES, EXPLOSIVE, EXTREMELY INSENSITIVE (ARTICLES, EEI) and hence more insensitive than other UN numbers which are defined in PP67 and L1 and for which the UK proposes the new SP[xxx]. Based on this and the discussion concerning the transport of UN 0486 unpackaged, Finland is of the opinion that UN 0486 could be added to the UN numbers for which this proposed change is assigned.

4. Finland supports the United Kingdom proposal and prefers proposal 2. Finland also proposes the following modifications to the proposals (**bold**):

Proposal 1

5. Amend the dangerous goods list in Chapter 3.2 as follows:
Delete PP67 and L1 from all the entries in the dangerous goods list to which they are assigned and assign SP[xxx] to all of those entries instead.
Add SP[xxx] to UN 0486.
6. Amend Section 4.1.4 as follows:
 - Delete PP67 and associated text from P130
 - Delete L1 and associated text from LP101
7. Amend Chapter 3.3 Special Provisions as follows:
Insert a new SP[xxx] with the same wording as either PP67 or L1 **with addition of UN 0486 to the list of UN numbers.**

Proposal 2 (alternative)

8. Amend the dangerous goods list in Chapter 3.2 as follows:
Delete PP67 and L1 from all the entries in the dangerous goods list to which they are assigned and assign SP[xxx] to all of those entries instead.
Assign SP[xxx] to UN 0486.
 9. Amend Section 4.1.4 as follows:
 - Delete PP67 and associated text from P130
 - Delete L1 and associated text from LP101
 10. Amend Chapter 3.3 Special Provisions as follows:
Insert a new SP[xxx] with the same wording as either PP67 or L1 omitting the list of UN numbers.
-