COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS
(Twenty-first session,
4-13 December 2000,
agenda item 2(b))

Comments on ST/SG/AC.10/2000/20
Classification of Ammonium Nitrate Emulsions

Transmitted by the Hazardous Materials Advisory Council (HMAC)

Introduction

1 The working group on classification of ammonium nitrate emulsions (ANE), intermediate for blasting explosives, was convened by the 16th Session of the Sub-Committee to:

a. determine appropriate classification criteria;

b. analyse the properties of emulsions so as to determine test methods that could be used to classify them;

c. analyse the need for a new test method to better assess the explosive properties of such emulsions; and

d. propose conditions for carriage, in particular packagings, tanks or IBCs, as appropriate for each type.

2 To this end, the working group has met twice, once in Norway in October 1999 and once during the 18th Session of the Sub-Committee in July 2000. The outcome of the meeting in Norway was a proposal that appeared to enjoy widespread support in accomplishing the objectives listed above. It was anticipated that the report of the Norway meeting would be reviewed briefly by the working group convened at the 18th Session, then considered and approved by the Sub-Committee.

3 In July, however, several late arriving documents were considered that eroded support for the recommendations of the Norway working group. Specifically, questions arose regarding the testing to be used to evaluate and assign a classification to ANE products. Several tests within the report were replaced with other tests for which no data were available to support the suitability of the proposed tests to perform the evaluations desired by the working group. In the end, the group agreed to recommend these new tests only after supporting data could be developed and adequately evaluated.

Discussion

4 At the time of submission of this paper, only limited data have been developed on the revised tests; therefore, their suitability has not been proven. Additional data may be made available during the Committee Session; however, submission of data at this late date does not allow for a thorough evaluation and a reasoned decision on the tests they would support.

5 HMAC has serious reservations about accepting these new tests proposed in ST/SG/AC.10/2000/20 without the availability of thoroughly evaluated supporting data. We believe that these tests may yield ambiguous and inaccurate results and may result in more restrictive classifications. We are unaware of any significant, transport related accident data to support such classifications. Sufficient time has not been allowed by the working group to perform the tests on a wide variety of ANE products; therefore, we are uncertain as to their suitability to properly evaluate and classify these products. Although limited testing has been performed, in our view, the testing regime needs to be expanded to a wider base of ANE products. Furthermore, we believe that acceptance of such a proposal, without supporting data, could lead to unknown and unsafe conditions in transport and would set a dangerous precedent.

6 It is our opinion that the task defined at the 16th Session of the Sub-Committee is achievable; however, sufficient time should be allowed to complete the work properly, including a thorough evaluation of any tests that might be proposed. Industry needs to be confident that any recommendations forthcoming are well thought out, provide for safe transport of ANE products in appropriate classifications, and require reasonable methods for evaluating and classifying ANE products.

Recommendation

7 HMAC urges the Committee to consider this work carefully and delay consideration of the proposals of ST/SG/AC.10/2000/20 and ../2000/20/Corr.1 until the next biennium. We further recommend that the Committee instruct the working group to continue to meet and investigate this issue in more depth during the 2001-2002 biennium with the goal to complete its task in time for adoption by the next Committee meeting in December 2002.

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