



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

THIRTIETH MEETING

Montréal, 6 to 10 October 2025

Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2027)
2.2: Develop proposals, if necessary, for amendments to the Technical Instructions for the *Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2027-2028 Edition

PROCEDURES FOR THE CLASSIFICATION OF EXPLOSIVES

(Presented by E Gillett)

SUMMARY

This paper seeks to clarify the roles of producers and appropriate national authorities for the classification of explosives and help shippers adhere to the packaging conditions upon which a classification has been made.

Action by the DGP: The DGP is invited to consider the amendments to Part 2, Chapter 1 of the Technical Instructions shown in the appendix to this working paper.

1. INTRODUCTION

1.1 Potential ambiguities in the procedures for classifying explosives contained in Part 2;1 of the Technical Instructions in relation to whether classification was to be determined by the shipper or an appropriate national authority were discussed at the Dangerous Goods Panel Working Group Meetings in 2024 (DGP-WG/24, 21 to 25 October 2024, Montreal) and 2025 (DGP-WG/25, 21 to 25 April 2025, Delhi, India) (see paragraphs 4.1.2.3 of the DGP-WG/24 Report and 4.2.2.1 of the DGP-WG/25 Report). The consensus at DGP-WG/24 was that the involvement of an appropriate national authority in the explosives classification process was necessary and was the intent of the UN Model Regulations and Technical Instructions.

1.2 A proposed amendment to the Technical Instructions requiring the involvement of an appropriate national authority was developed based on the discussions at DGP-WG/24 and presented to DGP-WG/25. A recommendation that manufacturers and subsequent distributors of explosive substances and articles make available the classification to enable subsequent shippers to verify that the original classification remain valid in the event of the explosives being repacked, for example in smaller quantities for subsequent distribution was also proposed. While there was support for these objectives, the working

group did not reach consensus on the approach taken in the proposal to achieve this. There were concerns that some States excepted some explosive divisions from classification involving an appropriate competent authority, and perceived implications that if classifications were recommended to be made available, a physical classification document might be expected over an electronic classification record and handling agents might arbitrarily demand the classification. Interested members agreed to work together to develop a proposal for competent authority involvement in classification and on ensuring that packaging used for re-packaged explosives was compliant based on their original classification for DGP/30. This working paper is raised based on the informal discussions held since DGP-WG/25.

1.3 With regards to subsequent shippers verifying that a classification made for explosives received remained valid in the event of the goods being repacked for subsequent distribution, the informal group considered that this was best dealt with by supplementing the note after 2;1.5.1.3:

Note.— The importance of this can be overlooked unless it is realized that a relatively minor change in an inner or outer packaging can be critical and can convert a lesser hazard into a mass explosion hazard.

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Consequently, if the explosives are repacked for subsequent distribution, the shipper will need to verify that the proposed packaging is permitted by the original classification or re-apply the classification procedure prescribed in this chapter.

It was felt that this achieved the objective without any need to recommend that the classification be made available to subsequent shippers.

1.4 With regards to the classification of explosives, the regulations of many States require a classification by their national authority for explosives travelling to, from or within their territory. Other States allow classifications that have been reached with the involvement of the national authority of another State. It is reasonable for States to determine which model is appropriate based on their capabilities and assessment of the risks involved. For this reason, the proposal in paragraph 2 is for the insertion of ‘1.5.1.4 Prior to transport, the explosive classification must have been conducted, approved or accepted by an appropriate national authority’ (it does not specify that the national authority must be of the same State as the manufacturer or shipper, etc. as such matters can be decided by each State). The revised wording also intends to provide for circumstances such as when the State excludes certain commodities such as small arms ammunition from the classification procedure and allows the shipper to assign a default classification or authorizes a private entity to issue a temporary classification for transport for the purposes of performing the classification procedure elsewhere.

2. ACTION BY THE DGP

2.1 The DGP is invited to consider the amendments to Part 2, Chapter 1 of the Technical Instructions shown in the appendix to this working paper.

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APPENDIX

PROPOSED AMENDMENTS TO THE TECHNICAL INSTRUCTIONS

Part 2

CLASSIFICATION OF DANGEROUS GOODS

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Chapter 1

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1.5 CLASSIFICATION OF EXPLOSIVES

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1.5.1.3 Except for substances that are listed by their proper shipping name in the Dangerous Goods List (Table 3-1), goods must not be offered for transport as Class 1 until they have been subjected to the classification procedure prescribed in this Chapter. In addition, the classification procedure must be undertaken before a new product is offered for transport. In this context, a new product is one which, in the opinion of the appropriate national authority, involves any of the following:

- a) a new explosive substance or a combination or a mixture of explosive substances which is considered to be significantly different from other combinations or mixtures already classified;
- b) a new design of article or an article containing a new explosive substance or a new combination or mixture of explosive substances;
- c) a new design of package for an explosive substance or article including a new type of inner packaging.

Note.— The importance of this can be overlooked unless it is realized that a relatively minor change in an inner or outer packaging can be critical and can convert a lesser hazard into a mass explosion hazard. Consequently, if the explosives are repacked for subsequent distribution, the shipper will need to verify that the proposed packaging is permitted by the original classification or re-apply the classification procedure prescribed in this chapter.

1.5.1.4 Prior to transport, the explosive classification must have been conducted, approved or accepted by an appropriate national authority.

1.5.1.4⁵ The producer or other applicant for classification of the product must provide adequate information concerning the names and characteristics of all explosive substances in the product and must furnish the results of all relevant tests which have been done. It is assumed that all the explosive substances in a new article have been properly tested and then approved.

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